

December 5, 1988

Mrs. Sylvia Lawrence, Dir.
Office of Solid Waste, WH-562
USCPAHQ
401 M Street, S.W.
Washington, D.C. 20460

RE: Ford Mtr. Co's permit for
use of the Allen Park Landfill
for hazardous waste.
ELLE MIO 980-568-711

Dear Mrs. Lawrence:

This is to let you know I'd like to prevent Ford Mtr.
Co's dumping their hazardous wastes in the A.P. landfill.
Your agency supposedly keeps residents safe from pollutants
and I believe Ford's toxic waste dumping here may already
be detrimental to our health.

A very thorough study should be made of our health
and waters before allowing further dumping of this
type waste as was done for many years.

Please help deny Ford's permit to again use this
landfill for toxic waste. Enough is enough! We
need to clear up this landfill - not add more to it.

Thank you for helping!

Yours truly,
Victoria Wild
19031 Snow
Dearborn, Mi.
48124

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date *Dec. 5, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. *Irving C. Heaton*

Address. *1660 Southfield, Dearborn, Mi. 48124*

Any Additional Message To Ms. Lowrance.

I'm a person that has recently lost a kidney to cancer. Now my latest Cat-scan has shown that I have (2) two spots on my liver. When I see and hear of all the cancer in our area, it shocks me.

Respectfully,

Name *Irving C. Heaton*
Mary M. Heaton

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *5.12.88* 1988

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

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Sincerely,

Name.

Antonio Guidi
344 Dumfries
Detroit, MI 48217

Address.

Eva

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec. 5, 1988*

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Sincerely,

Name. *Janet Laenz*

Address. *9180 Homer.
Detroit, Mich. 48209*

Any Additional Message To Ms. Lowrance.

Enough is Enough, Already!

Respectfully,

Name *Janet Laenz*

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date... 12-6-88...

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name.

John R. Millberg

Address.

*9152 Chamberlain
DET. MI. 48209*

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date... *Nov. 3, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name.

Stephane Dantine

Address.

*1930 Southfield Rd
Dearborn, Mich.
48124*

Any Additional Message To Ms. Lowrance.

*Please help us!
This is urgent!*

Respectfully,

Name

Stephane Dantine

Ⓐ

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. 12/3/88.

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name.

Alvin Paputa

Address.

18019 Snaw

Dearborn, mi 48124

Any Additional Message To Ms. Lowrance.

*I'm a 10 min walk to the Landfill in
Allen Park - too Close*

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

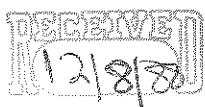
Date...12-3-88...

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Sincerely,



Name. Girard W. Mallow

Address. 2564 Bloomfield
Melvindale Mich 48122

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. Dec. 3, 1988.

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name.

ADDRESS

~~Address.~~
Karen Maillan

21503 Collingham FHills

Sheryl Harmon

38422 Webb Dr.
Westland, MI

Eddie Harmon

38422 Webb
Westland 48185

Any Additional Message To Ms. Lowrance.

Samara H. Gruber

34024 Richard
Wayne, MI 48184

Paul J. Woodworth
Paul V. DeBenedictis

32365 Cowan
Westland MI
34665 Glen
WESTLAND MI

Bruce G. Frederick
Rosa F. Frederick

48779 9 mi. RD
NORTHVILLE MI.

Lequan L. L. L.

34826 Fairchild

Joey Black

Westland
33019 Alamo to Westland

29273 LEROY Pontiac MI

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date 12-3-88

Dear Ms. Lowrance:

The regional EPA from Chicago recently issued a memorandum which concluded that tank trucks and tank cars used for feeding hazardous waste fuels to industrial boilers or furnaces would require a storage permit. They had a grave concern for our environmental and public safety should transportation devices be used for feed as they are not regulated like a stationary storage tank would be. I am sure you are aware that companies who do this bypass many regulations.

I hope that the Washington EPAHQ has the same kind of concern as the EPA regional office. Please do not over rule them. If you do, it would allow facilities like St Mary Peerless Cement in Detroit to burn this hazardous waste fuel with very little regulation. The first big city kiln in an area of over 500,000 people needs more regulation not less regulation. Hazardous waste is being used as fuel more and more. Strict measures need to be taken to insure the public that every safeguard will be made to ensure public safety. Short Cuts or loose interpretation of our laws only increases risks no matter where this takes place. Please consider my comments on this issue.

Sincerely,

Name.

*Gerard Mailhot - 2564 Bloomfield
Melvindale mich*

45122

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. Dec. 3, 1988

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Sincerely,

Name. MICHELLE GLOVIER / RICHARD STUMPF
3138 CHESTNUT
Address. DEARBORN, MI 48124

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

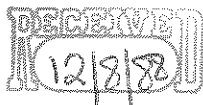
Date...12/3/88

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Sincerely,



Name. Mrs. Girard Mailbouy

2564 Sloanfield St
Address. Melvindale, Mich. 48122

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec. 3, 1988*

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Sincerely,

Name.

Richard Lesmeade

Address.

*1736 Walnut
Ann Arbor Mich 48124*

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

8

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date 12-3-1988

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name.

Joseph Malloy

Address.

1355 Chestnut
Dearborn 48124 Michigan

Any Additional Message To Ms. Lowrance.

Please; help our cause, we
like our neighborhood.

Respectfully,

Name

Joseph Malloy
Agnes Malloy

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *December 2, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. *Adolph + Maria Dubucki*
Address. *3174 Smith*
Dearborn, Mi 48124

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date... *DEC 2ND*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.
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Sincerely,

Name.

Address.

Les Raminitis
1712 WALNUT
DEARBORN MICH
48124

D. Ebbels
Chris R.
Reed Corinne



Date. Dec 2, 1988

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Jean Dytyne

Name.

3343 Croissant

Dearborn, Michigan 48124

Address.

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec. 2, 1984*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

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Sincerely,

Lawrence Cameron

Name.

1655 VENICE, DEARBORN, MI 48124
Address.

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec. 2, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name.

Rose Schrader

Address.

*457 Bayside
Detroit, Mich 48217*

Any Additional Message To Ms. Lowrance.

I am firmly opposed to the above stated Landfill. Which is located above the largest section of the Salt Mine. The chemicals could seep into the earth and into the mine, which is known to have water, which is pumped to the sewers into the Detroit River and on and on. This could cause a major ~~dis~~ problem in Michigan Waters. Please no more - don't poison our waters.

Respectfully,

Name

Mrs Rose Schrader

PS: My husband was an employee of International Salt Mine for 20 yrs.



Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. DEC. 2, 1988...

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name. PAUL & ANN BOSSIO

Address. 3513 RAYMOND

DEARBORN, MI. 48124

Any Additional Message To Ms. Lowrance.

Please take into consideration the highly populated area surrounding this landfill.

Respectfully,

Name

Paul P. Bossio

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. 12-2-88

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name.

Paul Cameron

Address.

7739 Manfield
Detroit, Mi. 48828

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date... *Dec 2, 1988*

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Sincerely,

Name.

Larry Coogan

Address.

190280 HAWTH

Melvindale Mich.

48122

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

(7)

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date... *Dec. 2, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name.

Henry W. Eck

Address.

*17485 Palmer
Melvindale 48122
Michigan.*

Any Additional Message To Ms. Lowrance.

Dear Ms. Lowrance;

*We the Citizens of Western Wayne
County need Protection from Toxic Waste
Dumps in this heavily Populated Area.
Come and see what your Agency is
doing to our future generation.*

Respectfully,

Name

Henry W. Eck.



America is #1
Thanks to our
Veterans



Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

(*)
Date *December 2, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name. *Eather Janigian*

Address. *1906 Southfield
Warren, MI 48094*

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date

Dec. 2, 88

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Sincerely,

Joyce E Morgan
Name.

Address.

*17200 Xalman
Melvindale Mich 48122*

Any Additional Message To Ms. Lowrance.

Please hear us

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec 2, 1988*....

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Sincerely,

Name.

Corey Nannings

Address.

1701 Walnut

Dearborn, Michigan 48124

Any Additional Message To Ms. Lowrance.

I live near the Hazardous waste landfill. Seven people who lived within 50 yards of my home have had cancer. Two of us are still living. Five of us had cancer since 1980 so are not counted in the cancer survey done about 5 years ago. The waste is allowed to blow in the wind and drained into the Rouge River.

Respectfully,

Name

Corey Nannings

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

④ -
Date... 12/2/88...

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name.

Gabriel Smigaj

Address.

1936 Venice Beach, M. 48124

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

②

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date Nov. 3, 1988

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. Sophie Spear

Address. 4413 S Dearborn
Harlemdale, Ill. 60138

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date... *Dec. 2, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely, *Walter Wozniak*

Name.

Address. *1832 Southfield Rd.
Dearborn Mich.
48124*

Any Additional Message To Ms. Lowrance.

*I live directly across the street from the dump,
and have lived within a mile of it when it was a
nice wooded area. Now trees and weeds can't survive
there any more. Lets have these health studies
BEFORE we permit dumping in a residential
neighborhood!
My wife and I have both lost our first mates
to cancer in 1983 and 1985*

Respectfully, *Walter Wozniak*
Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec. 2, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Lawrence Cameron

Name.

1655 VENICE, DEARBORN, MI 48124

Address.

Any Additional Message To Ms. Lowrance.

RECEIVED
JAN 25 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Respectfully,

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date.....12-2-88

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name.

Joseph R Hilbush

Address.

1165 Walnut
Dearborn, Mich 48124

Any Additional Message To Ms. Lowrance.

I have lived in this area for nearly 40 years. When C. J. Rogers trucking started hooking into this area, I was told by a Ford Motor Co. engineer that it was just a land fill. From that time until last September I did not know it was used as a toxic waste dump. I do not know if the city of Dearborn or any surrounding communities were notified of the original "Toxic Waste Permit" or if it went directly thru the state and federal system. I was never given notice that a "Toxic Waste Permit" was issued to Ford Motor Co. or was I ever given notice of the request for renewal. This looks like a under the Table deal between Ford Motor Company, the DNR and the EPA. I urge ~~to~~ you to oppose this permit and recommend that Ford Motor Company clean up what was previously dumped before it costs the taxpayers millions of dollars in the future for clean up. Respectfully

Respectfully

Name

Joseph R Hilbush

①

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-552
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. Dec. 1, 1988

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. Rachel S. Ballink

Address. 1860 Walnut
Dearborn, Mich.
48124

Any Additional Message To Ms. Lowrance.

Can you guarantee the health
and safety of my children?

Respectfully,

Name Rachel S. Ballink

④

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. Dec. 1, 1988

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. Rachel S. Ballink

Address. 1860 Walnut
Dearborn, Mich.
48124

Any Additional Message To Ms. Lowrance.

Can you guarantee the health
and safety of my children?

Respectfully,

Name Rachel S. Ballink

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

②
Date *Dec. 1, 1988*

● In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. *Ms. Dorothy T. Peterson*

Address. *1800 Linden
Dearborn, mi. 48124*

Any Additional Message To Ms. Lowrance.

*I am a 2 time winner with Cancer
I don't want to be a 3 time Loser.*

Respectfully,

Name

Dorothy T. Peterson

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *Dec 1-1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. *Dolores Podgornski*

Address. *17208 Harman
Melvindale, Michigan
48122*

Any Additional Message To Ms. Lowrance.

*With the Veterans hospital so close to this site,
And smack in the middle of a heavy
populated area how can a permit be
granted so easily. The salt mine wants
one too. This means the hazardous
waste would be on top & underneath our
homes as well. Please do not consider
this permit.*

Name, Respectfully,

Dolores Podgornski

Ⓟ

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. 12-1-88

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. THOMAS F. SAROGLIA

Address. 2647 RAYMOND
DEARBORN, MI. 48124

Any Additional Message To Ms. Lowrance.

THE COMPANY THAT WILL ADMINISTER THIS TOXIC LANDFILL HAS A HISTORY OF WASTE VIOLATIONS. I CANNOT BELIEVE THAT THEY WILL FOLLOW THE INTENT OF THE LAW OVER THE LONG HAUL AT THIS LOCATION.

THE POPULATION DENSITY OF THIS AREA MAKES ANY MISTAKES OR LEAKAGE OF TOXIC WASTE INTO THE ATMOSPHERE CAPABLE OF CATASTROPHIC PROPORTIONS. DON'T HAVE THIS HAPPEN BECAUSE OF YOUR BUREAUCRATIC ZEAL.

Respectfully,

Name

Thomas F. Saroglia

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date, *Dec. 1, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. *Riolette Griffen*

Address. *1940 Willow
Dearborn, Mich. 48124*

Any Additional Message To Ms. Lowrance.

*In March of this year
(60 yrs. age)
my husband had a kidney
removed due to cancer - we
have lived at above address since
1955.*

Respectfully, *Thank you,*

Name *Riolette Griffen*

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. 12-1-88.....

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely, *Thomas J. Griffen*

Name. THOMAS J. GRIFFEN

Address. 1940 WILLOW
DEARBORN, MI

Any Additional Message To Ms. Lowrance.

I lost a KIDNEY To cancer in April 1988 after 33 yrs of living within sight of this landfill. On a windy day much of the waste never makes it to the dump and if it rains, can pick up the waste in the road and it washes off in my drive.

Respectfully,

Name *Thomas J. Griffen*

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

②

Date 12-1-88....

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name. Eileen M. Nieves

Address. 3362 Raymond

Dearborn, Mich. 48124

Phone 1-313-563-5573

Any Additional Message To Ms. Lowrance.

Wayne, Oakland, and Macomb counties
have the highest rate of cancer in the state,
Our Inoa Woods area when compared to Wayne
Oakland, & Macomb has a higher rate than
of cancer than these counties. In the
individual study I'm doing - we have 26
people with cancer within one block of my
home - 16 already dead.. Please help us put
a stop to these toxic poisonings.

Respectfully,

Name

Eileen M. Nieves

Cancer study questions chemical workers' safety

Wet-Free Press
Oct 26, 1988

BY BOB CAMPBELL
AND DAWSON BELL
Free Press Staff Writers

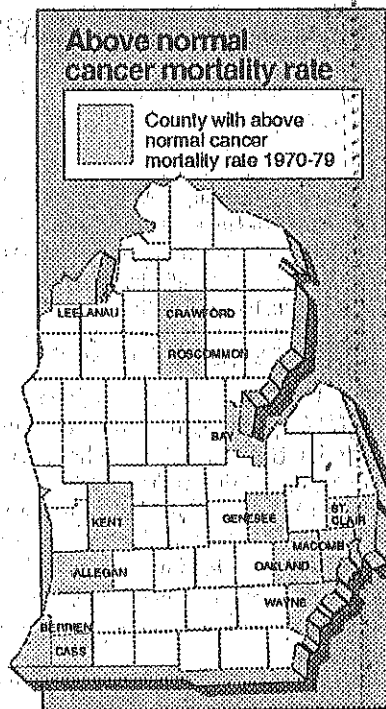
Many of the 13 Michigan counties that had the highest cancer rates in the 1970s also had large numbers of petrochemical industry workers and generated large amounts of toxic waste, according to a study released Tuesday.

The study, commissioned by the Public Interest Research Group in Michigan (PIRGIM), raised new questions about the safety of employees who work with hazardous chemicals, said Andrew Buchsbaum, who headed the study.

"It does not show that toxics cause cancer mortality in Michigan," Buchsbaum said. "To me, the study says we have to worry about toxic waste sites, which showed some correlation with the cancer rates, but also we must focus on exposure in the workplace."

The study showed that, on average, high cancer counties, which included Wayne, Macomb and Oakland, generate seven times more hazardous waste than the state average and have eight times more petrochemical employees and three times as many closed toxic waste dumps.

Cancer experts questioned the study, saying it is difficult to draw conclusions because many factors that are difficult to control can account for



differences in cancer statistics.

"There's sort of a fundamental problem with these studies," said Dr. Marie Swanson, vice-president for epidemiology of the Michigan Cancer Society. "You don't have enough cases to

See CANCER, Page 19A

Study questions workers' safety

CANCER, from Page 3A

know what's going on."

Dr. Donald Dolanski, medical consultant to the Center for Environmental Health Sciences in the Michigan Department of Public Health, said that the state has investigated many sites in recent years where citizens raised concerns about environmentally caused cancers.

"In all the ones investigated so far, we have not found one where there is a known environmental cause for any increase in cancers," he said. "Other studies show Michigan is not alone in that regard."

Dolanski said that a new computerized mapping system delivered to the health center this week should help the state identify cause-and-effect links between environmental and health prob-

lems within three years.

PIRGIM released the study as part of its effort to convince voters to support Proposal C, a ballot proposal to authorize the state to issue \$660 million in bonds for environmental cleanup and protection programs.

Gov. James Blanchard's environmental adviser, David Dempsey, said the study "underscores a problem for further research by the state, but it's premature to say we can show any such cancer links."

High cancer death counties outside the tri-county area are Allegan, Bay, Berrien, Cass, Crawford, Genesee, Kent, Leelanau, Roscommon and St. Clair.

Not all the counties experienced higher than average rates of cancer deaths in all four population groups — white males, non-white males, white females and non-white females. Only

Wayne County exceeded the average in all four categories. Genesee County was the only one to exceed the average in three categories.

Macomb County exceeded the average for male and female whites, while Oakland County exceeded the average only for white females.

Midland County was one of the state's largest generators of toxic waste in the 1970s, but does not have higher than normal cancer rates in any population category, the study found.

Buchsbaum said migration of southeastern Michigan residents to rural counties may explain why they had high cancer rates but lower toxic indicators. Those counties include Roscommon, Crawford and Leelanau.

Cancer causes about 25 percent of U.S. deaths, second only to heart disease, which is responsible for 48 percent of deaths.

Cancer deaths may be linked to toxic chemicals

By Dennis Pfaff
and Dwight E.M. Angell
News Staff Writers

LANSING — Thirteen Michigan counties, including the three that comprise Metro Detroit, have above-average cancer death rates that could be linked to toxic chemicals in the environment, a new study said Tuesday.

But state officials and the Public Interest Research Group in Michigan, which ordered the study — urged caution in interpreting the results.

"It's not necessarily a red flag just because you have higher-than-average (cancer) levels," said Thomas Rohrer, a state Department of Natural Resources water quality specialist and toxic chemical expert. "Averages are just that — some areas are going to be higher and some are going to be lower."

THE NINE-MONTH study was carried out by Public Data Access, a private New York consulting firm. The study compared 1970 through 1979 cancer death rates reported by the National Cancer Institute with information from government agencies covering social, economic and environmental factors.

Please see Cancer/8A

8A THE DETROIT NEWS/Wednesday, Oct. 26, 1988

Cancer Toxic chemicals in environment may be death link

From page 1A

The information was adjusted to discount the age of the population.

"This study provides evidence that the toxics crisis is having a substantial impact on human health and that the impact will grow unless we reduce human exposure to toxics," the study concluded. "The need for further study is urgent; the need for action is even more so."

But Dr. Dan Polanski, medical consultant to the state's Center for Environmental Health Sciences, said the study is "just an indicator that something further has to be done to further prove or disprove a relationship."

"All the studies we have done, we haven't been able to prove the same relationship," he said.

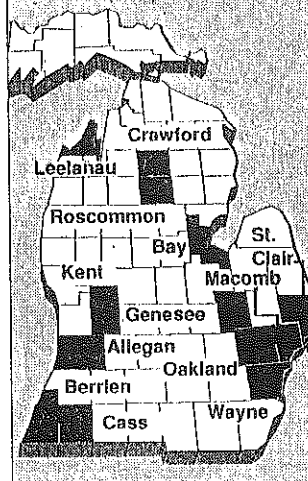
THE STATE Public Health Department is working on a computer mapping system it hopes will determine if there is a link between environmental causes and diseases. To be completed in three years, the system will allow health officials to see if air, water, soil or contaminated sites are causing cancer and other diseases.

PIRGIM acknowledged that the study presents no conclusive proof of a chemical-cancer link, but said it should spark more intensive research and cleanup activity in the state.

"Clearly more work is needed

Linking cancer to pollution

Public Interest Research Group in Michigan identified 13 counties that it says have above-average cancer death rates and also have high levels of toxic pollution.



here," said state Sen. Vern Ehler, R-Grand Rapids, Senate Natural Resources Committee chairman, who attended the Lansing news conference where the study was unveiled.

THE 13 COUNTIES identified as having cancer rates significantly above the national average were Wayne, Oakland, Macomb, Allegan, Bay, Berrien, Cass, Crawford, Gene-

see, Kent, Leelanau, Roscommon and St. Clair. The five counties around heavily industrialized Detroit and Flint have the most widespread cancer problems, the study said.

Statistically, the study found the greatest correlation between high cancer rates and large population, but said "merely being around more people is not in itself thought to cause cancer."

But when differences in population sizes were thrown out, annual production of toxic waste, annual employment in the chemical industry and the number of commercial hazardous waste management facilities all were found to distinguish the high-cancer counties from those with lower rates. There was less of a link between toxic waste dumps and cancer rates.

THE STUDY found that there were three times as many closed waste sites, seven times as much toxic waste generated, eight times as many petrochemical employees and 54 times more commercial hazardous waste facilities in counties with excess cancer rates than in the other counties.

Andrew Buchsbaum, program director of the 40,000-member PIRGIM, acknowledged there was no ready explanation for the higher cancer rates in less industrialized, resort-dotted counties such as Leelanau, Crawford and Roscommon. But the study theorized they may have experienced a large influx of people from other areas of the state — suggesting they brought their health problems with them.

THE STUDY did not compare cancer death rates with other suspected cancer-causing factors, such as smoking.

given to Dearborn Dept of Health Aug. 1985

88-11-07

✓
Snow Woods

Introduction

The Biostatistics Unit of the Michigan Cancer Foundation, Division of Epidemiology analyzed cancer incidence in the Snow Woods Neighborhood Area (1970 Census tracts 825.01 and 825.02) of the city of Dearborn at the request of the Dearborn Health Department. This project was completed as part of a larger study of the possible health and safety hazards posed by the Allen Park Clay Mine Landfill Hazardous Dump site which is adjacent to the Snow Woods Neighborhood. The analysis to be described addresses the question of whether there is an increased cancer incidence among residents of this neighborhood.

Methods

All cancer cases with the exception of non-melanoma skin cancers diagnosed between 1973 and 1981, by place of residence, were identified from the Michigan Cancer Foundation Cancer Surveillance System. Persons diagnosed with cancer while living within the 1970 census tracts 825.01 or 825.02 were taken to be Snow Woods cancer cases. There were 265 such cases, 264 of which were white and one black. The 4228 (4221 white and 7 black) Dearborn cancer cases consist of persons living within the City of Dearborn at the time of cancer diagnosis. 83,456 (59,614 white and 23,842 black) cancer cases were identified as living in Wayne County at the time of diagnosis and there were 130,948 (106,029 white and 24,919 black) cases identified in the tri-county area (Wayne, Oakland and Macomb counties). All persons identified were classified according to cancer site, age, race, and sex.

Snow Woods cancer cases were further classified according to street address. This was done so that the exact place of residence of each case could be plotted on a map of the Snow Woods neighborhood. The mapping procedure did not produce any clear results. Cancer cases were located around the perimeter of the two census tracts at the time of diagnosis. Fewer cases were found in the center part of both census tracts. This cancer distribution may be due to the distribution of family housing in these areas.

Using the 1973-1981 frequencies of cancer in the defined populations and population estimates for 1973-1981 (based on linear interpolation between the 1970 and 1980 census data for these areas) cancer incidence rates were calculated by age, sex and cancer site. Because there were so few blacks in Snow Woods, the nature of the census data precluded separating the Snow Woods population by race. The racial makeup of Dearborn is similar to that of Snow Woods so the Dearborn population was not stratified by race either. Both the Snow Woods and Dearborn populations have few blacks (1.25% and .09% black, respectively). For this reason, only the white Wayne County and white tri-county cancer incidence rates were used in the analysis.

The observed numbers of Snow Woods cancer cases (all races) were compared with the expected number of cases. The expected number of cancers was obtained by applying the cancer incidence rates in Dearborn (all races), Wayne County (whites) and the tri-county area (whites) to the Snow Woods population. This comparison was done by sex and age (<5, 5-9, 10-14, 15-19, 20-24, 25-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75+) for each site group in which there was at least one Snow Woods cancer case.

Standard Morbidity Ratios (SMRs) were calculated for each age, sex and site group category and for all sites combined, as the ratio of the observed to expected number of cancers in Snow Woods; the ratio then multiplied by 100. A one-sided statistical test was used to determine whether the SMR was statistically significantly greater than 100 ($p < .05$). The one-sided test was used because only an excess of cancer in the Snow Woods community was of interest.

Results

Of the 31 site groups analyzed (including all sites combined) 25 showed no statistically significant excess of cancer cases. These sites include: all sites combined, colon, pancreas, lung and bronchus, female breast, cervix, corpus uteri, leukemia, buccal cavity and pharynx, esophagus, anus, gallbladder, other biliary sites (including bile ducts, ampulla of Vater and biliary tract, NOS), larynx, soft tissue, skin melanoma, ovary, testis, bladder, kidney, other nervous system (including cranial nerve, spinal cord, cerebral and spinal meninges, and nervous system, NOS), thyroid, Hodgkin's lymphoma, non-Hodgkin's lymphoma, and ill-defined sites.

For those sites with at least one cancer in both sexes, a statistically significant ($p < .05$) excess of brain cancers among all persons (Table 1) was observed. While approximately 4 brain cancers were expected, (regardless of comparison group), 12 were observed, resulting in an SMR of approximately 300. For rectum, stomach and liver cancers, excesses were seen with two out of the three comparison groups. Analyses using tri-county whites and Dearborn residents resulted in significant excesses of cancer of the rectum and liver. In the case of stomach cancer, a significantly increased SMR was reported when comparisons were made with tri-county and

Wayne County whites. For all sites in which statistical significance was reached in at least one comparison group, SMRs were elevated (though not statistically significantly) regardless of comparison group.

Cancers in three site groups were found to be in excess only in males, however, the excesses were not seen consistently across all comparison groups. Cancers of the stomach and prostate in males were statistically significantly in excess ($p < .05$) when the expected number of cancers was calculated based on tri-county white and Wayne County white cancer incidence rates. Ten stomach cancers were observed while only about 4.5 were expected and 26 prostate cancers were observed while only about 17.4 were expected (Table 2). A statistically significant excess was not found for the same sites when the comparison was made based on Dearborn cancer incidence rates, however increases were found. Snow Woods males were also shown to have a statistically significant ($p < .05$) excess of multiple myeloma cases when compared with expected numbers calculated using Wayne County white cancer incidence rates (4 observed and 1.3 expected, an SMR of 300.3). An excess of soft tissue cancer cases was also observed, but only when the comparison group was Dearborn. Note that the numbers of observed cancers for these two sites are small.

Female residents of Snow Woods were shown to have an excess incidence of cancer of the liver (Table 1). This result was shown regardless of the comparison group used. While 3 liver cancers were observed among these women, only about 0.5 were expected, a statistically significant excess at $p < .05$.

city line tend to be higher than residents of the urban area. However, residents of either Wayne County or the entire state. However, the findings regarding the increased incidence of brain tumors in both sexes and of liver cancer in females may warrant further investigation.

*like that
see over there?*

(X)

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. 12-1-88

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

Dear Ms. Lowrance:

I am opposed to the Landfill Permit that would allow Fords to put a hazardous waste cell in their landfill in Allen Park. The EPA was originally conceived to help keep the environment safe for all the people. My community has a right to this protection. The EPA should not push this permit through, even before the cancer study requested by the Michigan DNR is completed. I do not want this landfill and furthermore, I want a complete health study of the area surrounding the present landfill as I believe it is the cause of many of the health problems in our area. Do not encourage this permit. I do not need any more potential problems in my community as we face too many problems now that your agency has failed to bring under control.

Sincerely,

Name. Mrs. Irene Cameron

Address. 1655 Venice
Dearborn, MI 48124

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date.. 12-1-88

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Sincerely,

Name. *Mary J. Eek*

Address. *17485 Palmer
Milwaukee, Mich. 48142*

Any Additional Message To Ms. Lowrance.

Stop the permit, let the future generations have hope. People are dying in this area with cancer. This is an area that is close to schools, hospitals & many, many, people?

Respectfully,

Name

Mary J. Eek

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date *Dec. 1, 1988*

In reference to; Ford Motor Co. Allen Park Hazardous Waste Landfill.

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Sincerely,

Name. *Miss Clara Janigian*

Address. *1906 Southfield
Dearborn, Mi 48124*

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

Ms. Sylvia Lowrance, Director
Office of Solid Waste, WH-562
USEPAHQ
401 M Street, S.W.
Washington, D.C. 20460

Date. *12-1-88...*

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Sincerely,

Name. *Manuel Nieves*

Address. *3362 Raymond
Dearborn, Mich 48124*

Any Additional Message To Ms. Lowrance.

Respectfully,

Name

November 28th, 1988

To; EPA HQ persons in charge of permitting hazardous waste landfills.

I am writing in regards to permit # MID980568711. This is the permit that would allow Ford Motor Company to put a hazardous waste landfill cell in their landfill in Allen Park, Michigan.

I am appalled to hear from the Michigan Dept of natural resources(MDNR). That the EPA is trying to push this landfill through because of some kind of crazy point system you have on permitting landfills, even though the MDNR has seen fit to initiate a cancer study of the surrounding area. A prior study indicated high brain tumor rates in men and women and liver cancer in women. The study admitted to being non-conclusive but indicated further study was needed. Now, the long awaited study has been initiated and our local enforcement agencies have informed us, you would like to push this through before that study is complete. That's crazy!! This isn't the first time the EPA has ignored the public health and environment in our area. You have stung us once with allowing St Mary Peerless Cement to apply for a permit to burn hazardous waste fuels in an area of over 500,000 by giving them some kind of interim status that they really did not deserve yet you helped them read between the lines and go for it. You have endorsed the storage of hazardous and toxic waste in the salt mines even after former employees and experts who worked in the mines said it is not safe. You people are too far away from our problems to decide anything down here. Your past performance from Love Canal to the radioactive industrys problems and your inability to monitor them, indicate just how far away from the problem you really are.

We have so much pollution here in the Detroit and downriver areas it isn't funny. I am so busy trying to fight pollution and make industries tow the mark so we can live here compatibly, I cannot understand how you can encourage more when what we have is not under control. Our area has been in Non-compliance of the clean air act for sometime. Yet you people are continuing to allow more waste, more possible sources of contamination and pollution, and more potential hazards into our neighborhoods. From trying to stuff toxins into Peerless cements Kiln for burning, chemical transportation companies, chemical cleanup companies with their dirty, filthy, stinky dangerous equipment, toxins in both the Clay mine and Salt mines, and so on. This does not include the hundreds of industries that are polluting in violation of the law in so many different ways, yet you do nothing to make them correct the problems. You dare try to bring in what you call "state of the art" today when you haven't even cleaned up what you called "state of the art" yesterday. NO MORE!!! ENOUGH IS ENOUGH!!! Nothing new should be introduced into these communities and you need to get down here and either clean up these messes or make the responsible parties clean it up.

When we stand up for ourselves you act as if we are radicals or fanatics. We are not as you simply put it " people who do not want it in our backyard". We are PEOPLE WHO HAVE A BACKYARD FULL OF IT!!!

Now, you have a landfill that you have waived ground water monitoring because of its' natural clay bed. Ignoring the fact that it is built over aquifers and natural artesianians. These are the potential source of uncontrolled run off and landfill leakage. Yet, you come up with some voodoo science that says it makes it better to put a landfill there! Give me a break!! Even in the future after this toxic dump is capped this artesian condition could cause massive problems and contamination. It is preposterous that you would have us believe that this kind of source of water be good for a land fill!! I am sick of this disinformation or double speech. Your people can manipulate facts and data to substantiate anything you want. Your opinion many times is not scientific fact but half guesses. You have been wrong as many times as you have been right.

There is no way to cut off this constant source of water unless by some act of God. Both the Allen Drain and the Tyre drain are two surface bodies of waters that originate on that site and enter the River Rouge. The possibility exist for major contamination. The very operating procedures which are supposed to mitigate the potential of release to surface water, such as run off control systems, inspections, and training are the same procedures that they have had non-compliance with in their past operation.

Another thing, What about the salt mine under it? Recent studies by the Legislative Science Office of Michigan show the worse part of the mine to be on the verge of collapse right under that landfill!! It is called Panel H of the Crystal mines. Others have told us that there is already contamination within the saltmine from test boring in it leaking contaminants from above possibly the claymine(that part is not clear) into the mine. The study was known as the NTF report by MEYER, TISEO AND HINDO. Supposedly Mr. Tomyn, owner of the crystal saltmines in Detroit ordered the study to coincide with approval to change our state rules on storage in mines. It is said when the study was complete it showed leakage, in the saltmines from above them, of water and contamination through the old test borings. I think it is worth looking into. It was said the study was not released as it did not have the result Mr. Tomyn wanted and he paid for it as a private study. I think all these possibilities are worth checking into. As an activist in my community I have learned not to leave a stone unturned should the possibility exist that harm may come to someone. There seems to be a basis here for further investigation. Especially when a study is named and a company.

Why not admit you are wrong? Make Fords cap the whole dump after cleaning it up and then restore it to its original wetlands condition. Wetlands are beginning to become non-existent around this part of the country.

Now, We sit here in our communities waiting for the dead body count, from a cancer study which the enforcement agencies are already discrediting and the study hasn't even been done yet!! They want to discredit numbers and people because they are old, because the cancer rates in this county are already high for some unknown reason, because there are already so many pollution problems that exist and so on. By this action they are trying to render this study as non-conclusive as the last. It seems like a lot of lip service to me. They want to pretend like they are addressing our concerns without really investigating our problem and helping us deal with it.

It is well known that the frame of mind the people are in when they are conducting a study will have a great impact on the portrayal of the statistics and their belief in it will lend to the credibility the study will portray in its final conclusion. I do not believe this study is being done to prove a connection between it and the landfill but to throw out a bunch of numbers that no one is willing to really correlate to anything that will help our cause. They do not want the numbers to show anything that would stop this landfill and therefore they will portray the statistics to substantiate their position.

What needs to be done is a conclusive, complete health study of SW Detroit and Downriver. A study which would cover all health problems from lung disease, sterility, cancer, asthma, heart problems, learning disabilities, birth defects, mortality rates, and so on. Only then will we know any thing conclusive. This is an area of a melting pot of all races, religions, ethnic backgrounds and financial classes. All of these people have a right to a safe environment. It is your responsibility to make sure that we get it. So when does this happen???

Please send me a written response to this letter that I may share with other community leaders on this issue. Thankyou for any time and effort you can spend in this matter.

Sincerely,



Brenda J. LiveOak
727 S. Dumfries
Det., MI 48217

November 28th, 1988

To the people at the EPA that decide on hazardous waste landfill permits;

This letter is about the Ford Motor company Allen Park Landfill on Oakwood in Allen Park Michigan. I have great concern about this. I need your help in getting this site turned down. I feel it is not safe and not healthy for the people who live around this. We do not need a hazardous waste landfill so near to here. We have got too much pollution we are living with now. I want to know, Am I supposed to trust you? If I am supposed to put my trust into you then your conscience would have to tell you that this is bad. If it does not tell you that then I do not know how you can sleep at night. I cannot trust Fords either because I know what I see. They have nasty stuff coming out of those stacks near here at the Rouge plant all the time. I have called time and time again and no one does anything or seems to care. The point I am trying to make is that if I can not trust them at the Rouge Plant, How can I trust them with something so big and important as this? I want to make this clear. I can not trust you because you will not stop them from messing up the air where I live. I cannot trust them because they simply do not care. You have a responsibility to make sure that these things do not happen. I do not think you should add to your responsibilities and you need to straighten everything out and make everyone here who is polluting stop!!

Sincerely: Janice S. Tackett

Janice S. Tackett

727 S. Dumfries

Det., MI 48217

Marie A. Schuetze
3305 Willow
Dearborn, Mi. 48124

December 1, 1988

Dear Mr. Lee Thomas,

I wish to express my very deep concern and opposition regarding Ford Motor Company's toxic waste disposal clay mine in Allen Park, Michigan. The file number is MID 980-568-711.

It is unthinkable that such a waste site is allowed to exist less than half a mile from a densely populated residential area, the Oakwood Hospital complex, two schools, a church, the Veterans Administration Hospital and much more on the other side of this DUMP.

I vehemently oppose this toxic waste dump and urge you, Mr. Thomas, as our administrator of the Environmental Protection Agency to do all in your power to also oppose it.

Do not allow Ford Motor Company to continue using this clay mine as a toxic waste dump.

Surely, the Ford Motor Company with all it's modern technical knowledge can come up with a better, safer and less harmful method of disposing of their toxic waste.

Sincerely,

Marie A. Schuetze

WATKINS, J. L. JR.
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Susan M. Taylor
2604 Venice
Dearborn, MI 48124

December 2, 1988

Mr. Lee M. Thomas, Administrator
Environmental Protection Agency
401 M Street S.W.
Washington, D.C. 20460

Re: EPA File No. MID 980-568-711

Dear Mr. Thomas:

As a resident of the Snow Woods neighborhood in Dearborn, Michigan, I join with my neighbors in expressing my concern and displeasure over the proposed TOXIC waste facility being planned by Ford Motor Company within a mile of my home.

While I am willing to give Ford Motor Company the benefit of a doubt that they are sincere in their statements that this will be "the most secure landfill in the United States," I also believe that their permit should be withheld until more studies are done on the cancer rates in this neighborhood. In a preliminary study performed by the Michigan Cancer Foundation in 1982, brain and liver cancers were found to be three times higher in the Snow Woods neighborhood than elsewhere in Wayne County, and speculation is high among its residents that substances previously dumped at this site could be the cause. In 1985, when Ford's previous permit for the dumping of hazardous waste expired, they chose not to renew rather than conform to stricter EPA standards. I interpret this to indicate that the previous standards were found not to be as safe as they should have been, and that we are at some risk now.

In conclusion, it is my opinion that Ford Motor Company and the state and federal environmental agencies should exhibit more concern for the feelings of the residents of this area by the performance and publication of more extensive health studies before a permit is granted and the dumping commences.

Respectfully,


Susan M. Taylor

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December 1, 1988

RE: FILE #MID 980-568-711

Mr. Lee M. Thomas, Administrator
Environmental Protection Agency
401 M/ S.W.
Washington, D.C. 20460

Dear Mr. Thomas:

This letter is being written to you to inform you of our frantic concern regarding your position as a protector of the environment. It has come to our attention that you are pressuring our Michigan D.N.R. representative to grant Ford Motor Company a permit to dump hazardous waste at the Allen Park Clay Mine.

In the last election, 90% of the voters approved a proposal to clean up waste sites in Michigan and environmental problems are the number one priority issues to be addressed.

Since this site is in the midst of residential sections of Melvindale, Allen Park and Dearborn, it is almost unbelievable that you would even consider pressuring the very person (who has the mandate of the state on environmental issues) from doing his job....protecting the public.

Please remember that a survey was conducted in this area and that the greatest number of cancer cases occurred in this area. This is not a coincidence since this dump site was first opened in 1956 and gradually became a hazardous dump in the 1980's (which surprised us all) - until it was closed in 1986. It was always presumed to hold only furnace dust, as the Ford Motor Company stated. It was closed in 1986 by the DNR, due to Ford's violations of regulations.

We know you will do your job and not help grant this permit and in the process - save a few lives and some beautiful residential sections of the city.

Thanking you,

Dawn Coon
(Mrs.) JOSEPH A. COON
2652 Venice St.
Dearborn, MI 48124

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November 30. 1988.

Mr. Lee M. Thomas
Administrator Environmental
Protection Agency
401 M/S.W.
Washington, D.C. 20460

Dear Mr. Thomas:

I am concerned taxpayer and homeowner of the city of Dearborn, Michigan. This letter is regarding the proposed toxic waste site in Allen Park, in our neighbourhood. I am strongly opposing such a permit, that would endanger lives of our communities, and values of our homes as well.

Federal E.P.A. is pressuring the State D.N.R. to grant a permit to the Ford Motor Company, allowing them to dispose of toxic waste near residential homes. They have been telling us how very safe that site would be; but in reality they do not know, nobody can exactly know how dangerous living next to the toxic waste site would be, and how could that affect our lives. I am a mother of two children and am worried very much about their future.

This toxic waste site is the only proposed toxic waste site within such a proximate of residential homes in the U.S!

I hope, Mr. Thomas that you will do everything in your power to stop F.E.R.A and State D.N.R. from giving such a permit to Ford Motor Company, and protect our communities. As a taxpayers and homeowners we have right to be protected - quality of our lives, lives of our children!

Thank you for your attention to the above matter,

Sincerely,
Cv. Estuiza
Worried mother

File number:

MID 980-568-711

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Thomas R. Brown
17730 Snow
Dearborn, Mi 48124

The Honorable Lee M. Thomas
Administrator, U.S.
E.P.A.
401 M Street S.W.
Washington, D.C. 20460

Dear Administrator Thomas:

I am writing this letter to inform you of a very serious problem of southeastern Michigan. Ford Motor Company has recently asked the state D.N.R. to grant a permit for the use of dumping toxic wastes at the Allen Park clay mine. The file number of the permit is MID 980-568-711.

Ford Motor Co. may have informed you that this land-fill site is very safe. This information is false and dangerous. Ford Motor Company wants a new permit to dump toxic wastes at a site that was up to this date only a dumping grounds for hazardous wastes. For over thirty years the site was used by Fords to dump hazardous wastes. The clay that they claim will be used as a natural barrier is almost gone because Ford Motor Company took most of the clay out of the area and sold it to Peerless Cement Company. It only takes one mistake either by mother nature or by man to make this area lifeless. Because my health and safety and my families health and safety are of paramount concern to me, I do not want this facility to become a toxic waste land. Therefore, I would appreciate answers to the following questions:

1. Does the Ford Motor Company permit application specifically designate or restrict the type and nature of materials that may be disposed into the clay mine site? Does Ford Motor Company have the option of adding additional materials to those listed in their permit application that will be deposited into the landfill?

2. What is the nature of the materials that Ford Motor Company proposes to dispose into the Clay Mine facility? Are these materials comprised merely of heavy metals or do they include volatile organic compounds (VOCs) or other non-volatile organic compounds? Under which criteria do the materials qualify as hazardous wastes? Please provide me with an explanation of the resulting impact these materials will have on the environment and human health.

3. If the materials do include organic compounds or other hazardous wastes, do you anticipate any air emissions from the disposal of these materials that could endanger the environment or public health? Are you aware that in personally counting 34 trucks that entered the Allen Park Clay mine, I never saw any of these trucks covered safely and I visibly noticed dust and debris spilling off of each

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truck. If Ford Motor Company gets this new permit can they absolutely guarantee that all of their trucks will be safely covered at all times and that when dumping the waste can they be 100% sure that there will never be a mistake made?

4. If the disposed materials include any sludge materials, has Ford provided assurances that the material disposed into the clay mine facility will be free of organic compounds?

5. Has a proper study been conducted as to the geological integrity of the ground upon which the clay mine is located? How thick is the clay and how far down below the clay structure is the aquifer?

6. Will the composition and structure of the lining of the disposal facility ensure that all materials deposited into the landfill will not leak into any substructures, such as the underground salt mines that lie beneath this facility, or result in exposure of those materials to the public, or that these materials will not cause a significant deterioration of the lining?

7. Does the permit application require, or does the U.S. EPA or MDNR intend to implement, a groundwater and air quality monitoring system in and around the disposal site to ensure that the public health and safety is protected? Has U.S. EPA or MDNR already conducted any testing of water resources in the vicinity of the clay mine facility?

8. Is there any danger of overflow from rainwater? What plans have been made to deal with any wastewater that might result from the landfill operation?

9. What are the specific responsibilities of U.S. EPA and MDNR in the permit approval process? What specific procedures are involved in approving the permit application?

10. Please explain what opportunities have been provided for public input into the permit application approval process.

11. Are there any other alternative sites in Michigan that is further removed from dense population centers that Ford Motor Company could use in disposing of its materials?

The above questions are copied from a letter from Congressman John D. Dingell, of Michigan, in which he included in a letter he sent back to me. The above questions were sent to both the EPA and MDNR and he requested a December 15th due date on his questions. Please send me the answers.

Would you buy a house in this area? Can Michigan afford the possible negative publicity at a national level? The American Broadcast Company (20 20) would enjoy letting our nation know about the possible toxic waste site. If Fords really was concerned about the quality of human life, they would consider an alternative site that wasn't within three miles from a population of 100,000 people. This site is the only proposed toxic waste site within such a dense area of residential homes throughout the United States.

Sincerely,

Thomas R. Brown

Thomas R. Brown

December 1, 1988

RE: FILE #MID 980-568-711

Mr. Lee M. Thomas, Administrator
Environmental Protection Agcy.
401 M/ S.W.
Washington, D.C. 20460

Dear Mr. Thomas:

This letter is an appeal to you to help Michigan's D.N.R. representative refuse to permit Ford Motor Company to dump toxic waste at the Allen Park Clay Mine.

This site is located within several residential areas which is almost unheard of in the whole U.S. Even friends living in Detroit and Farmington are expressing concern that a toxic site is so near to them. So we do not think it is an unrealistic request to demand some action, as a concerned citizen, who lives within blocks of this area.

We have lived in this beautiful suburb since 1945 and watched the wetlands disappear and of course objected to this dumping in 1956. We were reassured that it would hardly be visible to our area and from the road. When questioned on what material was being carried in - it was only furnace dust. Recently, we learned that in 1980's hazardous dumping was permitted (by Mayor of Allen Park) and was closed in 1986 by the DNR for violations of regulations by Ford's. (Cancer survey showed very high in area)

Since they are again trying to reassure us how hazardous and toxic waste will not ruin our lungs or give us cancer-- we hesitate to trust their statements, due to past experience. Meanwhile more and more cancer cases are reported and our property is not being protected by the very persons that the voters mandated for Environmental Proposals.

PLEASE SAY NO TO THE PERMIT!!

Sincerely,

Ellen Hawrone

2444 Venice

Rochester, N.Y.

78124

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CORK CONTROL

Dear Sir,

I do not want toxic waste
disposed of at the Allen Park
clay mine.

Judy Rusinowski

MIO 980-568-711

Lucinda LaGosh
3312 Chestnut Street
Dearborn, MI 48124
313/563-8792

Mr. Lee M. Thomas
Administrator
Environmental Protection Agency
401 M/S.W.
Washington, D.C. 20460

RE: MID 980-568-711

Dear Mr. Thomas:

As a Dearborn resident I am vigourously opposed to granting Ford Motor Company a permit to dump toxic waste at the Allen Park clay mine.

New York's Love Canal should be lesson enough for everyone. I do not want my family subjected to contaminated water and future health problems. There is no safe way to dispose of toxic waste. Also, since EPA officials have been convicted of accepting bribes and turning heads, who do we trust with our families welfare.

Companies should look more into recycling toxic waste to break it down into non-toxic substances, before dumping at sites that can never be foolproof.

Respectfully,


Lucinda LaGosh

/c1

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File MLD 980 568 711

Dec 2, 1988

atten: Mr Lee M. Thomas

Please be advised that I am
vehemently opposed to allowing a permit
to be granted to The Ford Motor Co.
allowing them to dispose of Toxic
waste at the Allen Park Clay
Mine. File no MLD 980 568 711

We do not want or need this
garbage in our Community.

Please deny their request for
the health and sake of all the
Citizens in this area

Thanking you in advance for your
cooperation on this matter

I remain Sincerely

Margaret Surling (age 73)
(Long time voter)

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EPA
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DEC. 1, 1988

To: Mr. Lee M. Thomas/Administrator
Environmental Protection Agency

Subject: Toxic Waste Dump. (MID 980-568-711)

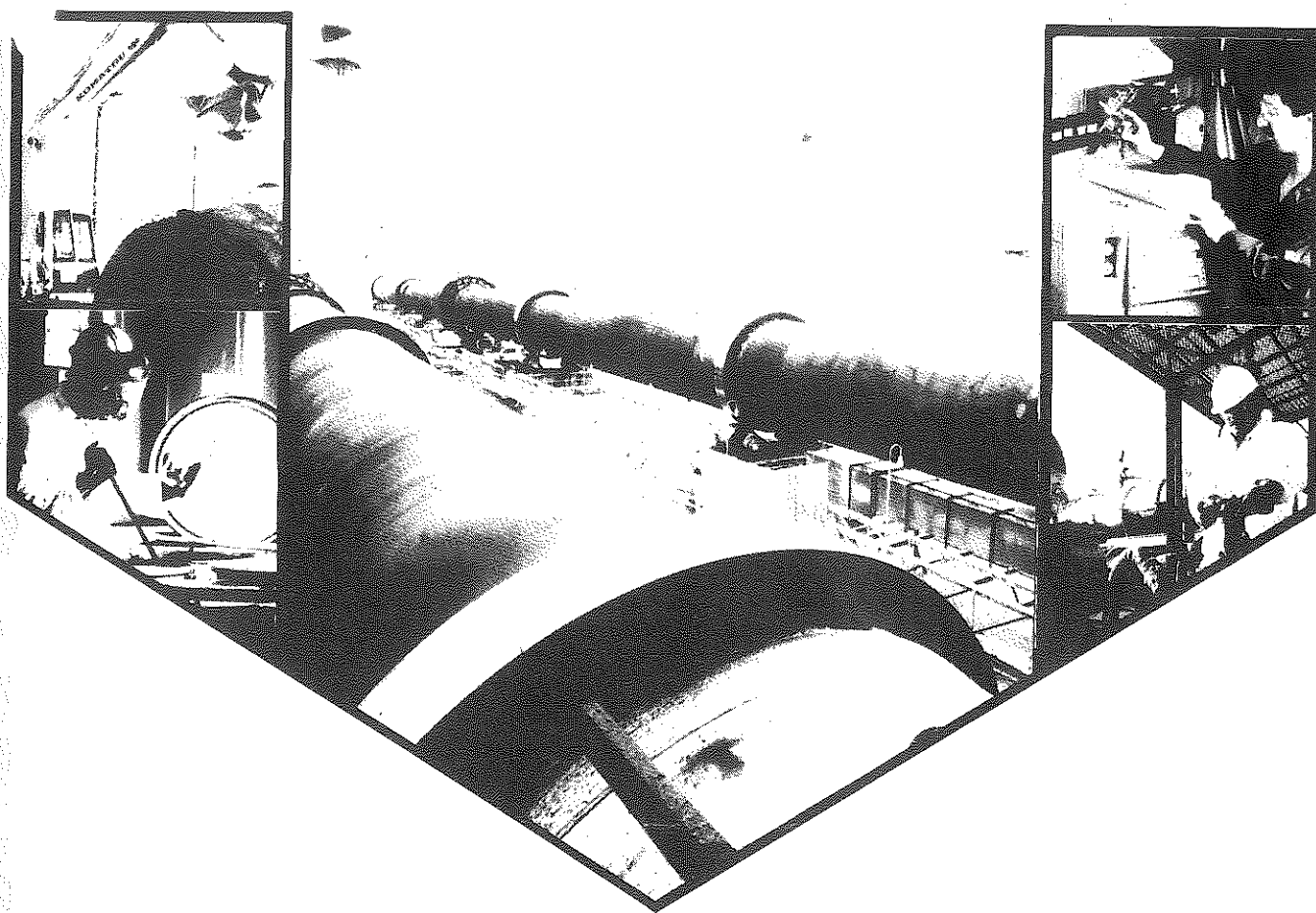
I know you are aware of the toxic waste dump Ford Motor Company is trying to put in there Allen park clay mine. As a concerned citizen of Dearborn, living within Ford Motor Company town for 37 years, knowing how they have past alot of doings underhandedly feel it would be a bad risk to have a toxic waste dump so close to a residitlial area.. Not only for the toxic waste that might seep into are water and ground, but also the air pollution.

I've lived in Dearborn, for 37 years like I stated and I know for a fact that in my area of the city not far from Fords alot of the residents have died of cancer of one type or another.

I feel Ford has to choose a better way to get rid of (THERE HAZARDOUS & TOXIC WASTE). It might cost a little more money now to install, but in the long run it will save them money and the lives of people and our children. As our representative it will save you our VOTES to keep you in office. I'm also enclosing a few of Fords other choices.

Citizen of Dearborn

Mike & Donna Favor
2644 Edgewood
Dearborn, Mi. 48124



AT 2600° F. WE'RE WARMING UP TO YOUR HAZARDOUS WASTE

Sophisticated thermal destruction techniques for many types of wastes is but one new method of waste disposal Intersol Industries—and its affiliate Patchem—provides. Thermal destruction at cement kilns offers many technical advantages over commercial incinerators. For example, there is 99.99+ destruction efficiency operating at temperatures of over 2,600° F. Residence time is 10 to 20 seconds. All ash resulting from cement kiln burning is used in the cement production process. The method thus meets RCRA objectives by utilizing the waste beneficially through energy and raw material replacement.

Intersol/Patchem can arrange for bulking and blending of drummed materials, such as D001 and F001 through F005 and liquefying heavy

solids and sludges. Hazardous and non-hazardous solids, including contaminated soils, can also be processed.

We're proud of our thermal destruction technology, just as we are of our technical services group and remedial teams who provide solutions to your complex environmental problems. Our laboratory capability can solve your analytical needs, and our transportation coordinators will arrange to move your waste safely, reliably and in accordance with DOT regulations.

Phone now and let us answer your questions about our cost-effective ideas for waste disposal.

INTERSOL INDUSTRIES CORP.

New Ideas for Waste Disposal

1273 BOUND BROOK ROAD, MIDDLESEX, NJ 08846

201-469-9090

"front end" detoxification price competitive in the marketplace. As oil prices vary in world commodity markets, the detoxification price will vary in order to remain competitive and produce a reasonable profit margin for the supplier.

Pure PCB Fluids: Askarel

Unlike PCB-contaminated mineral oil, pure PCB fluids, generically called askarels, cannot currently be recycled. These fluids consist of 600,000 to 800,000 ppm PCB with the remaining portion consisting of

chlorinated benzenes, a solvent medium for the PCBs. The only current economic way to deal with askarel fluid is to incinerate it in an EPA-approved incinerator. The 1984 EPA legislation on PCBs requires the elimination of askarel transformers from public buildings by 1990. From a resource recovery viewpoint, although the fluid must be incinerated, these askarel transformers can be saved for continued service by using a reclassification service. The key challenge in reclassifying an askarel transformer is thorough PCB remov-

al from the transformer windings. The proprietary SYSTEM 50 service provided by Sun Environmental succeeds in thorough PCB removal, allowing reclassification of the transformer to non-PCB status, general in less than a year.

After draining the askarel for incineration, a proprietary, non-flammable, non-PCB fluid is placed in the transformer which promotes rapid leaching of PCBs from the windings. The compact System 50 processor is installed next to the transformer and essentially performs a continuous "dialysis" on the fluid until the PCB level is reduced to a point that the transformer can be reclassified to non-PCB status. In addition to retaining the remaining economic life of the transformer, the eventual disposal of the non-PCB transformer can include recycling of the unit through scrapping and salvage of the copper or aluminum coil. If the unit retained PCBs and failed, it would have to be buried in an approved hazardous waste landfill or scrapped in a TSCA approved facility where there is currently very little capacity.

Alternatives of the Future

Key requirements for solving other hazardous substance problems by recycling/recovery include technology development and realistic regulation. In the current technical and regulatory arena, development of economically feasible solutions requires significant investment and broad expertise.

ABOUT THE AUTHOR

William B. Maling is president and chief executive officer of Sun Environmental, Inc. of Canton, OH. He spent 18 years at Sun Company in a variety of positions including president of Sun Shipbuilding Company subsidiary and corporate vice president of business development. He holds a BS degree in mechanical engineering with an industrial option from Drexel University.

On September 30, 1988, Sun Environmental is changing its name to ENSR Operations, taking its place as the Remedial Operations Division of this major consulting, engineering, laboratory, technology application, and remediation organization (ENSR Corporation traded on AMEX, "ENX").

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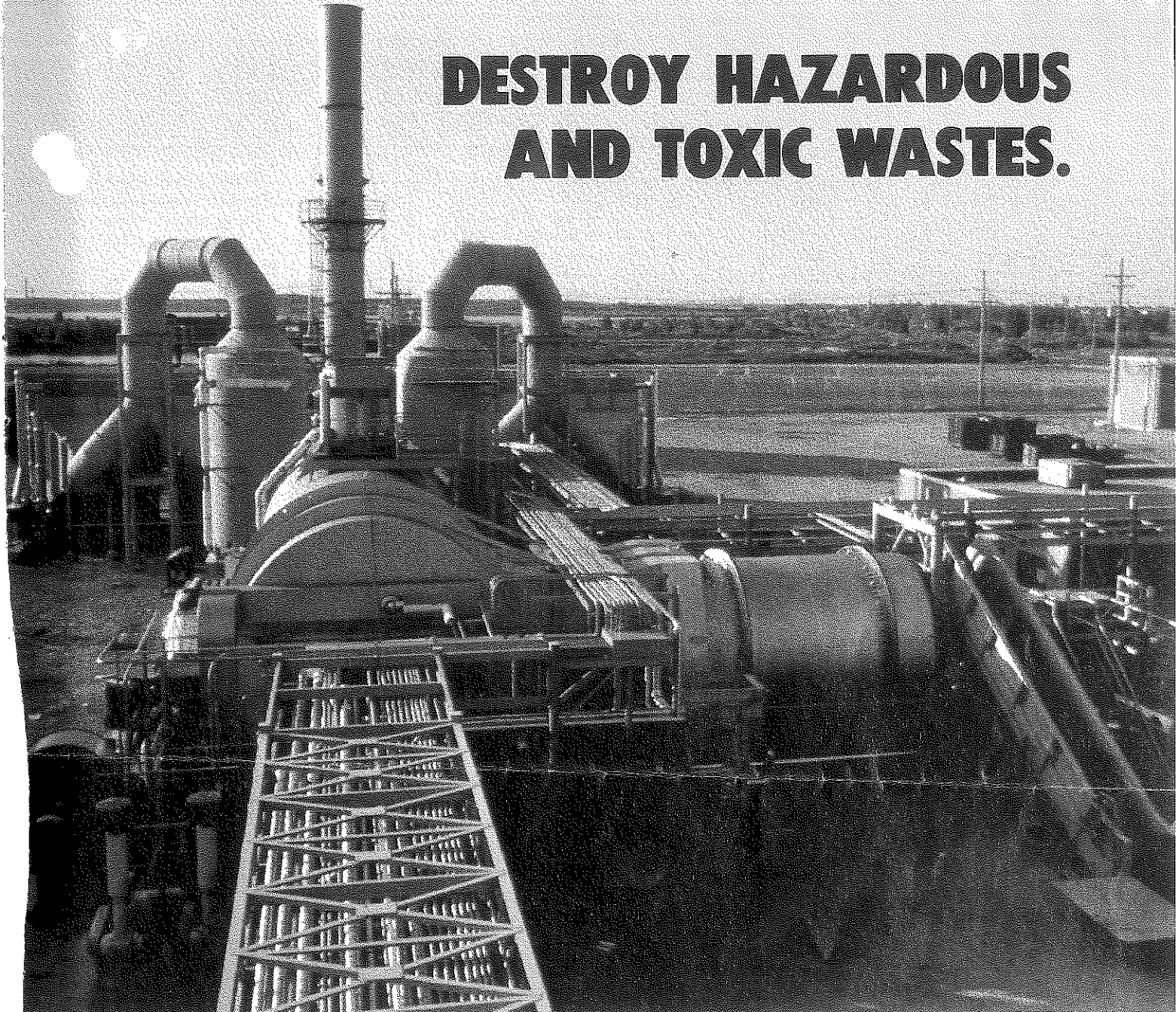
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Combustion Engineering, Inc.
200 West Monroe Street
Chicago, IL 60606
(312) 236-4044

COMBUSTION ENGINEERING

(Continued from page 38.)

Minnesota; Revision to Final Authorization of State Hazardous Waste Management Program; 40 CFR Part 272; Final Rule; Effective: Sept. 18, 1987; 52 FR 27199-27200

DOT: Federal Highway Administration; Driving of Motor Vehicles; Out of Service Criteria; 49 CFR Part 392; Final Rule; Effective: Aug. 19, 1987; 52 FR 24200-27201

July 20, EPA: Toxic Chemical Reporting; Community Right-to-Know; Proposed Rule; 40 CFR Part 372; 52 FR 27226-27229

July 22, EPA: Alternate Concentration Limit Guidance for Hazardous Waste Management Facilities; Notice of Availability; 52 FR 27579-27580

National Priorities List for Uncontrolled Hazardous Waste Sites; Federal Facility Sites; Proposed Rule; 40 CFR Part 300; 52 FR 27643-27647

July 23, EPA: Emergency Planning and Community Right-to-Know Programs; Denial of Toxic Chemical List Petition; Correction; 52 FR 27902

July 27, EPA: Superfund Program; Covenants Not to Sue Request of Public Comment; 52 FR 28038-28044

July 28, EPA: Liners and Leak Protection for Hazardous Waste Land Disposal Units; Extension of Comment Period; 40 CFR Parts 260 et al.; 52 FR 28167-28168

July 30, EPA: Monthly Status Report for March 1987; Premanufacturing Notices; 52 FR 28522-28524

July 31, EPA: Certain Chemicals; Premanufacture Notices; 52 FR 28602-28605

DOT: Federal Highway Administration; Driver's Record of Duty Status; 52 FR 28632

AUGUST, 1987

Aug. 3, EPA: Hazardous Waste Management System; Identification and Listing of Hazardous Waste; Final Denials; 40 CFR Part 261; 52 FR 28696-28697

Identification and Listing of Hazardous Waste; Spent Pickle Liquor from Steel Finishing Operations; 40 CFR Part 261; 52 FR 28697-28698

OSHA: Occupational Exposure to Lead; 29 CFR Parts 1910 et al.; 52

FR 28727-28730

Aug. 4, EPA: Superfund Program; Nonbinding Preliminary Allocations of Responsibility (NBARs); 52 FR 28867

Aug. 6, EPA: Issuance of and Administrative Hearings on RCRA Section 3008(h) Corrective Action Orders for Hazardous Waste Management Facilities; 40 CFR Parts 22 and 24; 52 FR 29222-29228

Aug. 7, DOT: Research and Special Programs Administration; Nevada Public Service Commission Regulations Governing Transportation of Hazardous Materials; 52 FR 29468

Research and Special Programs Administration; Triborough Bridge and Tunnel Authority Regulations Governing Transportation of Radioactive Materials and Explosives; 52 FR 29468

Aug. 10, EPA: Colorado; Schedule of Compliance for Modification of Hazardous Waste Programs; 40 CFR Part 271; 52 FR 29522

DOT: Research and Special Programs Administration; Bulk Packagings and Miscellaneous Amendments; 49 CFR Parts 171, 172, and 173; 52 FR 29526-29527

EPA: Hazardous Waste; Transfer of Data to Contractor; 52 FR 29566-29567

Superfund Program; Indoor Air Quality Implementation Plan; 52 FR 29566-29567

OSHA: Hazardous Waste Operations and Emergency Response; Notice of Proposed Rulemaking and Public Hearings; 29 CFR Part 1910; 52 FR 29620-29654

Aug. 11, EPA: Permitting Mobile Hazardous Waste Treatment Units; 40 CFR Parts 260, 265, and 270; 52 FR 29708

DOT: Research and Special Programs Administration; Applications for Renewal or Modification of Exemptions or Applications to Become a Party to an Exemption; 52 FR 29743-29745

Applications for Exemptions; 52 FR 29745-29746

Aug. 12, EPA: Hazardous Waste Management System; Identification and Listing of Hazardous Waste; Final Exclusion Rule; 40 CFR Part 261; Effective: Aug. 12, 1987; 52 FR 29846-29849

Hazardous Waste Management System; Identification and Listing of Hazardous Waste; Final Exclusion Rule; 40 CFR Part 261; Effective: Aug. 12, 1987; 52 FR 29849-29851

Hazardous Waste Management System; Land Disposal Restrictions; California List Constituents; Notice of Availability and Request for Comments; 40 CFR Part 268; 52 FR 29992-30040

Aug. 13, EPA: Maine; Final Authorization of State Hazardous Waste Management Program; 40 CFR Part 271; 52 FR 30192-30194

Aug. 14, EPA: Changes to Interim Status and Permitted Facilities for Hazardous Waste Management; Procedures for Post-Closure Permitting; Proposed Rule; 40 CFR Parts 265, 270, and 271; 52 FR 30570-30579

Schedule of Compliance for Modification of Tennessee's Hazardous Waste Program; 40 CFR Part 271; 52 FR 30682-30683

Aug. 20, DOT: Research and Special Programs Administration; Emergency Response Communication Standards; Notice of Proposed Rulemaking; 49 CFR Part 172; 52 FR 31486-31494

Aug. 21, EPA: Polychlorinated Biphenyls in Electrical Transformers; Proposed Rule; 40 CFR Part 761; 52 FR 31738-31747

Aug. 24, OSHA: Hazard Communication; Final Rule; 29 CFR Parts 1910 et al.; Effective: Sept. 23, 1987; 52 FR 31852-31886

EPA: Statistical Methods for Evaluating Groundwater Monitoring Data from Hazardous Waste Facilities; Proposed Rule; 40 CFR Part 264; 52 FR 31948-31956

Aug. 27, OSHA: Occupational Exposure to Lead; 29 CFR Parts 1910 et al.; 52 FR 32312-32313

EPA: Underground Injection Program; Hazardous Waste Disposal Injection Restrictions; Amendments to Technical Requirements for Class I Hazardous Waste Injection Wells; and Additional Monitoring Requirements Applicable to All Class I Wells; Proposed Rule; 40 CFR Parts 124 et al.; 52 FR 32446-32476

EPA: Superfund Program; Interim Guidance on Compliance with Applicable or Relevant and Appropriate Requirements; Notice of Guidance; 52 FR 32496-32499

December 2, 1988

Mr. Lee M. Thomas, Administrator
Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

Re: Ford Motor Company Toxic Waste
Permit Application (File # MLD 980-568-711)

Dear Mr. Thomas:

We strongly urge that you deny Ford's request for a permit to dump toxic waste at the Allen Park (Michigan) Clay Mine landfill, which is within a 3-Mile radius of some 500,000 people. It makes no sense to allow the disposal of toxic waste in the midst of such a densely populated area.

Environmental Protection exists for the physical and economic good of the persons in the environment. We are counting on you to do the right thing in this situation.... Let's not sacrifice the quality of life of 500,000 human beings for a corporation (FOMOCO).

Cordially yours,

Max A. Weston

Cecil M. Weston

1658 Birchcrest Dr.
Ann Arbor, Mi. 48124

File no. MID 980-568-711

Mr. Lee, M. + Lomen/ad.

We are writing to oppose the toxic waste dump site. It is not fair to us to have to accept this for the rest of our lives.

We don't want to leave our children sick. Please help us.

Thank you,
M. Lee M. + Lomen

88DEC 7 49:48
EPA
CORR. CONTROL
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in

Nov. 26, 1988

Mr. Lee M. Thomas
Administrator EPA

401 M, S.W.

Washington D.C. 20460

Ref: EPA File # MID 980-568-711

Dear Mr. Thomas

I am deeply concerned over the Ford Motor Co. Crag mine. This hazardous toxic dumpsite is located less than 1/8 of a mile from a well populated area in Weathersburg.

As study did prove that the level of cancers in our area were higher than the rest of Wayne County. This is a great concern as well as the devaluation of our properties.

I hope you share our concern and take the necessary steps to shut down

the hazardous/toxic dumpsite

I sincerely feel Ford Motor should
be forced to relocate this dumpsite
far removed from large populated
areas and health care facilities.

Your comments on this matter
would be appreciated

Yours very truly
Eugene Wright

1617 Linden

Dearborn, MI 48124

12/2/88

MR. LEE M. THOMAS

ENVIRONMENTAL PROTECTION AGENCY
PERSONNEL IN CHARGE OF PERMIT ISSUING

SUBJECT: PERMIT FOR FORD, ALLEN PARK
HAZARDOUS WASTE LANDFILL

AS A RESIDENT FOR 35 YEARS IN THE
AREA, IT HAS COME TO MY ATTENTION THAT
THE DNR CLAIMS THEY ARE BEING PUSHED
BY YOU, THE EPA, TO PUSH PERMIT
* MID 980-568-711 THROUGH FOR THE OPERATION
OF THIS HAZARDOUS TO HEALTH DUMP.

WHAT IS GOING ON? THE DETROIT NEWS
PRINTS THAT THE HEALTH STUDIES HAVE
BEEN APPROVED, BUT THE CELL WILL OPEN
BEFORE THE STUDY IS COMPLETED. THIS
IS RIDICULOUS. WHY IS FORD DOING THIS TO
US?

YOU PEOPLE ARE SUPPOSED TO PROTECT
THE ENVIREMENT AND THE HEALTH OF
(OVER)

OF THE PEOPLE,

THIS DUMP HAD A PERMIT TO DUMP
TOXIC WASTE. THE PERMIT WAS NOT
RENEWED BECAUSE THE GROUND WATER
AND THE NEARBY ROUGE RIVER WERE
CONTAMINATED.

NOW THEY WANT A PERMIT TO DUMP
HAZARDOUS WASTE. THIS IS CRAZY
WITHIN A 1 MILE RADIUS OF THE
DUMP HAS A POPULATION OF 100,000 PEOPLE,
A LARGE VETERANS HOSPITAL ADJACENT TO
THE SITE, A LARGE HOSPITAL AND 3 SCHOOLS
WITHIN A 1/4 MILE AREA.

THESE PEOPLE HAVE TO HAVE THE
PROTECTION OF YOUR AGENCY. PLEASE
NO PERMIT.

SINCERELY

WILLIS WAGNER

19:60 2 3300 488 SHERWOOD CT.

DEARBORN MICH.

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EPA
CORR. CONTROL

48124

Dear Sir:

I am writing in regards
to the Toxic Dump in Allen
Park, Mich File # MID-980-568-711
which is almost in my back
yard. (2 Blocks away) I would
appreciate if you would really
give this some consideration
before you issue a permit
to Ford Motor Co. I don't
have that much time left
in this great world (75 yrs)
but please consider the
younger generation coming up
around here - (Lung, respiratory
and other problems) also the
big one Cancer - also

our property values ~~are~~^{is} your
Dept going to make up the
difference of what we lose
when we sell our homes?
(as if anybody will buy in
this area)

Please think this over

Mrs Gertrude Jones

1825 Linden

Dearborn

mi

48124

880000 7 A9:50

RECEIVED

7/1

RECEIVED

1431 Hollywood
Dearborn, Michigan 48124
December 2, 1988

Dear Mr. Thomas,

As concerned home owners in the Dearborn Snow Woods area we would like to protest the approval of a permit to the Sand Motor Co allowing them to dispose toxic waste at the Allen Park Clay mine.

Millions of dollars are being spent to clean up toxic waste areas and it doesn't make sense to put one in such proximity to a residential neighborhood and then have to clean it up later. Who knows what damage will have been done in the meantime. No other toxic waste site in the United States is that close to a residential area, and we don't want it there.

As administrator of the Environmental Protection Agency it is your job to protect us from this danger to our health and land.

Yours truly,

Stuart and Frances Baker

File Number MID 980-568-711

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3362 Raymond
Dearborn, Mich 48124
Dec. 2, 1988

Dear Mr. Thomas, Administrator
Environmental Protection Agency
401 M. Street Southwest
Washington DC 20460

Dear Sir:

I am writing with concern to the F.M.C. Clay
mine permit # MID 980-568-711.

I am sending you some information
regarding cancer in our area. The PIRGIM
Study shows Wayne, Oakland, & Macomb
counties to have the highest rates of
cancer in the state. The Mich. Cancer
Forum Study shows the Snow Woods area
to have a higher rate than the Tri County
area. We in the Snow Woods area are
now doing individual studies for
Wayne County Health Dept. Env. Protection
Bureau with complete data - names,
ages, occupations ect. In a one block
area of my home are 26 people who
were cancer victims - 16 now dead.
These are grave concerns to the people
of this area.

Also if the permit is granted, will the

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4. M.C.'s insurance, over any problems?
I understand they are using Co's
net worth as insurance. Do the
Stock Holders understand this
type of collateral? Is it enough?

3-6 million and 1-2 million will
not cover medical expenses should
more studies show that these toxics cause
cancer. Also the value of the bones
far exceed 6 million should this
area be another Love Canal and we
have to vacate this area.

There are many aspects to the permit
that could cause many problems.
We do not want this permit issued
and will go to any means to stop
it. We need your help. Please
don't let us down.

Sincerely

Edna M. Feives

Cancer study questions chemical workers' safety

Detroit Free Press
Oct. 26, 1988

BY BOB CAMPBELL
AND DAWSON BELL
Free Press Staff Writers

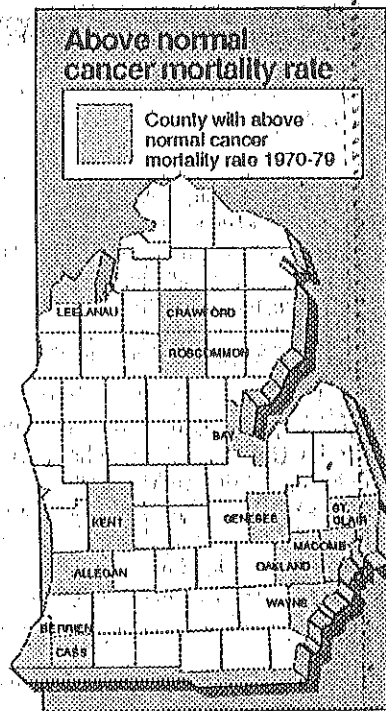
Many of the 13 Michigan counties that had the highest cancer rates in the 1970s also had large numbers of petrochemical industry workers and generated large amounts of toxic waste, according to a study released Tuesday.

The study, commissioned by the Public Interest Research Group in Michigan (PIRGIM), raised new questions about the safety of employees who work with hazardous chemicals, said Andrew Buchsbaum, who headed the study.

"It does not show that toxics cause cancer mortality in Michigan," Buchsbaum said. "To me, the study says we have to worry about toxic waste sites, which showed some correlation with the cancer rates, but also we must focus on exposure in the workplace."

The study showed that, on average, high cancer counties, which included Wayne, Macomb and Oakland, generate seven times more hazardous waste than the state average and have eight times more petrochemical employees and three times as many closed toxic waste dumps.

Cancer experts questioned the study, saying it is difficult to draw conclusions because many factors that are difficult to control can account for



differences in cancer statistics.

"There's sort of a fundamental problem with these studies," said Dr. Marie Swanson, vice-president for epidemiology of the Michigan Cancer Society. "You don't have enough cases to

See **CANCER**, Page 19A

Study questions workers' safety

CANCER, from Page 3A

know what's going on."

Dr. Donald Dolanski, medical consultant to the Center for Environmental Health Sciences in the Michigan Department of Public Health, said that the state has investigated many sites in recent years where citizens raised concerns about environmentally caused cancers.

"In all the ones investigated so far, we have not found one where there is a known environmental cause for any increase in cancers," he said. "Other studies show Michigan is not alone in that regard."

Dolanski said that a new computerized mapping system delivered to the health center this week should help the state identify cause-and-effect links between environmental and health prob-

lems within three years.

PIRGIM released the study as part of its effort to convince voters to support Proposal C, a ballot proposal to authorize the state to issue \$660 million in bonds for environmental cleanup and protection programs.

Gov. James Blanchard's environmental adviser, David Dempsey, said the study "underscores a problem for further research by the state, but it's premature to say we can show any such cancer links."

High cancer death counties outside the tri-county area are Allegan, Bay, Berrien, Cass, Crawford, Genesee, Kent, Leelanau, Roscommon and St. Clair.

Not all the counties experienced higher than average rates of cancer deaths in all four population groups — white males, non-white males, white females and non-white females. Only

Wayne County exceeded the average in all four categories, Genesee County was the only one to exceed the average in three categories.

Macomb County exceeded the average for male and female whites, while Oakland County exceeded the average only for white females.

Midland County was one of the state's largest generators of toxic waste in the 1970s, but does not have higher than normal cancer rates in any population category, the study found.

Buchsbaum said migration of southeastern Michigan residents to rural counties may explain why they had high cancer rates but lower toxic indicators. Those counties include Roscommon, Crawford and Leelanau.

Cancer causes about 25 percent of U.S. deaths, second only to heart disease, which is responsible for 48 percent of deaths.

Cancer deaths may be linked to toxic chemicals

By Dennis Pfaff
and Dwight E.M. Angell
News Staff Writers

LANSING — Thirteen Michigan counties, including the three that comprise Metro Detroit, have above-average cancer death rates that could be linked to toxic chemicals in the environment, a new study said Tuesday.

But state officials and the Public Interest Research Group in Michigan, which ordered the study — urged caution in interpreting the results.

"It's not necessarily a red flag just because you have higher-than-average (cancer) levels," said Thomas Rohrer, a state Department of Natural Resources water quality specialist and toxic chemical expert. "Averages are just that — some areas are going to be higher and some are going to be lower."

THE NINE-MONTH study was carried out by Public Data Access, a private New York consulting firm. The study compared 1970 through 1979 cancer death rates reported by the National Cancer Institute with information from government agencies covering social, economic and environmental factors.

Please see Cancer/8A

8A THE DETROIT NEWS/Wednesday, Oct. 26, 1988

Cancer Toxic chemicals in environment may be death link

From page 1A

The information was adjusted to discount the age of the population.

"This study provides evidence that the toxics crisis is having a substantial impact on human health and that the impact will grow unless we reduce human exposure to toxics," the study concluded. "The need for further study is urgent; the need for action is even more so."

But Dr. Dan Polanski, medical consultant to the state's Center for Environmental Health Sciences, said the study is "just an indicator that something further has to be done to further prove or disprove a relationship."

"All the studies we have done, we haven't been able to prove the same relationship," he said.

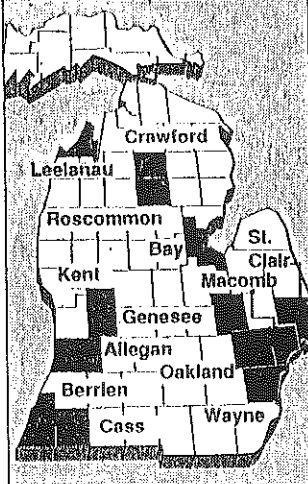
THE STATE Public Health Department is working on a computer mapping system it hopes will determine if there is a link between environmental causes and diseases. To be completed in three years, the system will allow health officials to see if air, water, soil or contaminated sites are causing cancer and other diseases.

PIRGIM acknowledged that the study presents no conclusive proof of a chemical-cancer link, but said it should spark more intensive research and cleanup activity in the state.

"Clearly more work is needed

Linking cancer to pollution

Public Interest Research Group in Michigan identified 13 counties that it says have above-average cancer death rates and also have high levels of toxic pollution.



here," said state Sen. Vern Ehler, R-Grand Rapids, Senate Natural Resources Committee chairman, who attended the Lansing news conference where the study was unveiled.

THE 13 COUNTIES identified as having cancer rates significantly above the national average were Wayne, Oakland, Macomb, Allegan, Bay, Berrien, Cass, Crawford, Gene-

see, Kent, Leelanau, Roscommon and St. Clair. The five counties around heavily industrialized Detroit and Flint have the most widespread cancer problems, the study said.

Statistically, the study found the greatest correlation between high cancer rates and large population, but said "merely being around more people is not in itself thought to cause cancer."

But when differences in population sizes were thrown out, annual production of toxic waste, annual employment in the chemical industry and the number of commercial hazardous waste management facilities all were found to distinguish the high-cancer counties from those with lower rates. There was less of a link between toxic waste dumps and cancer rates.

THE STUDY found that there were three times as many closed waste sites, seven times as much toxic waste generated, eight times as many petrochemical employees and 54 times more commercial hazardous waste facilities in counties with excess cancer rates than in the other counties.

Andrew Buchsbaum, program director of the 40,000-member PIRGIM, acknowledged there was no ready explanation for the higher cancer rates in less industrialized, resort-dotted counties such as Leelanau, Crawford and Roscommon. But the study theorized they may have experienced a large influx of people from other areas of the state — suggesting they brought their health problems with them.

THE STUDY did not compare cancer death rates with other suspected cancer-causing factors, such as smoking.

Letter to Dearborn Health Dept. Aug. 1983

70-11-88

✓
Snow Woods

Introduction

The Biostatistics Unit of the Michigan Cancer Foundation, Division of Epidemiology analyzed cancer incidence in the Snow Woods Neighborhood Area (1970 Census tracts 825.01 and 825.02) of the city of Dearborn at the request of the Dearborn Health Department. This project was completed as part of a larger study of the possible health and safety hazards posed by the Allen Park Clay Mine Landfill Hazardous Dump site which is adjacent to the Snow Woods Neighborhood. The analysis to be described addresses the question of whether there is an increased cancer incidence among residents of this neighborhood.

Methods

All cancer cases with the exception of non-melanoma skin cancers diagnosed between 1973 and 1981, by place of residence, were identified from the Michigan Cancer Foundation Cancer Surveillance System. Persons diagnosed with cancer while living within the 1970 census tracts 825.01 or 825.02 were taken to be Snow Woods cancer cases. There were 265 such cases, 264 of which were white and one black. The 4228 (4221 white and 7 black) Dearborn cancer cases consist of persons living within the City of Dearborn at the time of cancer diagnosis. 83,456 (59,614 white and 23,842 black) cancer cases were identified as living in Wayne County at the time of diagnosis and there were 130,948 (106,029 white and 24,919 black) cases identified in the tri-county area (Wayne, Oakland and Macomb counties). All persons identified were classified according to cancer site, age, race, and sex.

Snow Woods cancer cases were further classified according to street address. This was done so that the exact place of residence of each case could be plotted on a map of the Snow Woods neighborhood. The mapping procedure did not produce any clear results. Cancer cases were located around the perimeter of the two census tracts at the time of diagnosis. Fewer cases were found in the center part of both census tracts. This cancer distribution may be due to the distribution of family housing in these areas.

Using the 1973-1981 frequencies of cancer in the defined populations and population estimates for 1973-1981 (based on linear interpolation between the 1970 and 1980 census data for these areas) cancer incidence rates were calculated by age, sex and cancer site. Because there were so few blacks in Snow Woods, the nature of the census data precluded separating the Snow Woods population by race. The racial makeup of Dearborn is similar to that of Snow Woods so the Dearborn population was not stratified by race either. Both the Snow Woods and Dearborn populations have few blacks (1.25% and .09% black, respectively). For this reason, only the white Wayne County and white tri-county cancer incidence rates were used in the analysis.

The observed numbers of Snow Woods cancer cases (all races) were compared with the expected number of cases. The expected number of cancers was obtained by applying the cancer incidence rates in Dearborn (all races), Wayne County (whites) and the tri-county area (whites) to the Snow Woods population. This comparison was done by sex and age (<5, 5-9, 10-14, 15-19, 20-24, 25-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75+) for each site group in which there was at least one Snow Woods cancer case.

Standard Morbidity Ratios (SMRs) were calculated for each age, sex and site group category and for all sites combined, as the ratio of the observed to expected number of cancers in Snow Woods; the ratio then multiplied by 100. A one-sided statistical test was used to determine whether the SMR was statistically significantly greater than 100 ($p < .05$). The one-sided test was used because only an excess of cancer in the Snow Woods community was of interest.

Results

Of the 31 site groups analyzed (including all sites combined) 25 showed no statistically significant excess of cancer cases. These sites include: all sites combined, colon, pancreas, lung and bronchus, female breast, cervix, corpus uteri, leukemia, buccal cavity and pharynx, esophagus, anus, gallbladder, other biliary sites (including bile ducts, ampulla of Vater and biliary tract, NOS), larynx, soft tissue, skin melanoma, ovary, testis, bladder, kidney, other nervous system (including cranial nerve, spinal cord, cerebral and spinal meninges, and nervous system, NOS), thyroid, Hodgkin's lymphoma, non-Hodgkin's lymphoma, and ill-defined sites.

For those sites with at least one cancer in both sexes, a statistically significant ($p < .05$) excess of brain cancers among all persons (Table 1) was observed. While approximately 4 brain cancers were expected, (regardless of comparison group), 12 were observed, resulting in an SMR of approximately 300. For rectum, stomach and liver cancers, excesses were seen with two out of the three comparison groups. Analyses using tri-county whites and Dearborn residents resulted in significant excesses of cancer of the rectum and liver. In the case of stomach cancer, a significantly increased SMR was reported when comparisons were made with tri-county and

Wayne County whites. For all sites in which statistical significance was reached in at least one comparison group, SMRs were elevated (though not statistically significantly) regardless of comparison group.

Cancers in three site groups were found to be in excess only in males, however; the excesses were not seen consistently across all comparison groups. Cancers of the stomach and prostate in males were statistically significantly in excess ($p < .05$) when the expected number of cancers was calculated based on tri-county white and Wayne County white cancer incidence rates. Ten stomach cancers were observed while only about 4.5 were expected and 26 prostate cancers were observed while only about 17.4 were expected (Table 2). A statistically significant excess was not found for the same sites when the comparison was made based on Dearborn cancer incidence rates, however increases were found. Snow Woods males were also shown to have a statistically significant ($p < .05$) excess of multiple myeloma cases when compared with expected numbers calculated using Wayne County white cancer incidence rates (4 observed and 1.3 expected, an SMR of 300.3). An excess of soft tissue cancer cases was also observed, but only when the comparison group was Dearborn. Note that the numbers of observed cancers for these two sites are small.

Female residents of Snow Woods were shown to have an excess incidence of cancer of the liver (Table 1). This result was shown regardless of the comparison group used. While 3 liver cancers were observed among these women, only about 0.5 were expected, a statistically significant excess at $p < .05$.

The brain is the only cancer site for which both males and females were seen to have a statistically significant ($p < .05$) excess (Table 1). This excess is shown with all of the comparison populations used. Six brain cancer cases were observed among both the male and female residents of Snow Woods while only about 2 brain cancers were expected for each sex group. The excess occurred in the 45 and 25-34 year age groups for males and the 65-69 and 65-74 year age groups for females.

Discussion

It can be seen, from the results presented above, that the only statistically significant excess of cancer consistently found in the Snow Woods population is for brain cancer in both males and females and for liver cancer in females. Also shown in the above presentation is that statistical significance is influenced by the comparison group used in the analysis. It is important to note that expected values are calculated using incidence rates which are, in turn, based on population estimates for intercensal years. The reliability of such an estimate may vary with the population under study. The accuracy of the incidence rates and, therefore, the expected numbers will depend on the accuracy of the population estimates. Further caution should be taken when interpreting these results because of the large number of statistical tests performed. Each test has a 5% probability of being rejected (resulting in a significant excess of cancers) by chance alone. The large number of statistical tests carried out further increases the possibility that statistically significant SMRs occurred by chance.

The results presented do not take into account the length of residence in the Snow Woods neighborhood for each cancer case. This information is not available through the Cancer Surveillance System. Therefore, there is no assurance that cancer cases are long-term residents of the area of concern. Furthermore, long-term residents of this neighborhood who moved from these census tracts and subsequently developed cancer could not be identified. A number of other factors could not be controlled for in this analysis including cigarette smoking, alcohol use, and occupation, all of which may be related to cancer occurrence. For example, the development of liver cancer has been linked to hepatitis B virus, alcohol and aflatoxin exposures. (Schottenfeld and Fraumeni, Cancer Epidemiology and Prevention, W.B. Saunders Co., Philadelphia, 1982). Thus, it is impossible to implicate any one factor, such as the hazardous waste dump, as the causal factor resulting in the excess number of cancers on the basis of this investigation.

Studies have shown that systemic injection of certain chemicals into experimental animals results in a high incidence of nervous system tumors. These chemicals include N-nitrosamide, dialkylaryltriazines, azo, azoxy and hydrazo compounds, and a polycyclic aromatic hydrocarbon. Epidemiologic investigations have reported an association between brain tumors and x-ray exposure, lead (in children), barbiturates, work in rubber manufacturing and vinyl chloride exposure. (Schottenfeld and Fraumeni, Cancer Epidemiology and Prevention, W.B. Saunders Co., Philadelphia, 1982).

Based on the above results and discussion, there is insufficient evidence to conclude that the residents of the Snow Woods neighborhood are at a higher risk of cancer because of their association with the Allen Park

(
(
~~Play line (and fill) Hazardous Dump than residents of Dearborn, or white~~
~~residents of either Wayne County or the entire state of Michigan. However,~~

the findings regarding the increased incidence of brain tumors in both sexes
and of liver cancer in females may warrant further investigation.

Will that
be ever done?

City of Melville's
Response

(Ford Motor Company -
Clay Mine)

I N D E X

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Proves F.M.C does not comply.

INTRODUCTION

The residents of Southeast Michigan, in particularly the Downriver area are tired of being Hazardous Waste CAPITAL of the state. We already have the most polluted river in the Great lakes basin (the Rouge) and the dirtiest air in the state according to DNR and EPA reports. Within the next several years there will be at least 3 new incinerators on line. We the residents of Downriver have had ENOUGH. There are those that say, Why Not store and process hazardous waste in Wayne County, they have the most industry. The truth is that Wayne County already processes and stores over 3 times the amount of hazardous waste it generates.

CONCERNS

- 1.) Medical Problems - There are numerous toxins that are going to be stored at this facility, if this permit goes through. (See Table I) All of which will have a significant effect on health, if released into the environment. For example, studies show that Phenal and Napthalnene are toxic to humans and aquatic life. Further, these waste constituents are capable of migrating in significant concentrations if mismanaged, and are likely to be mobile and persistent: so that waste mismanagement could result in substantial human health or environmental hazard. Phenal is readily absorbed by all routes. Repeated exposure to phenal at high concentration HAVE resulted in chronic liver damage in humans. Chronic poisoning, following prolonged exposures to low concentrations of vapor or mist, results in digestive disturbances (vomiting, difficulty in swallowing, excessive salivation, diarrhea); nervous disorders (headache, dizziness, mental disturbances) and skin eruptions. OSHA list it as highly toxic at 5 p.p.m.

Who is going to monitor air, @ WJC APC.

1) over worked (1)

2)

This same scenario is illustrated for almost every chemical this permit seeks to allow at this Oakwood facility.

It is worth noting that Chromium or Cadmium particulate escaping from mis-managed emission control dust is another pathway of concern. These minute particles could be dispensed by WIND if waste dust are piled in the open, (which this facility has been cited with on numerous occasions in the past), placed in unsecure landfills or improperly handled during transportation.

As a result, the health of persons who inhale the airborne particulates would be jeopardized.

Cadmium is also a cumulative poison, essentially irreversible in effect.

Excessive intake leads to kidney damage and inhalation of dust also damages the lungs.

SNOW WOODS STUDY

X: This study was conducted by Michigan Cancer Foundation. The data used showed the incidence of cancer between the years 1973-1981. NOTE: Snow Woods is the subdivision which lies west of the site. The study found in sum; there were 265 cancer cases in this area. While 4 cases of brain cancer would be expected in a population area of this size 12 were observed, in addition there was a significant increase in rectum and liver cancer. While 4.5 stomach cancers were expected 10 were observed. In addition, the report also stated approximately 17.4 prostate cancers were expected, 26 were observed. *The list goes on* THIS-GOES-ON

A study has never been done to the best of my knowledge, of the residents who live on the east side of the Clay mine. Since the winds are primarily from the west. I would urge that a study be carried out prior to the granting of any permit. If a study was good enough for Dearborn residents, certainly

it should be done for the residents of ALLEN PARK, LINCOLN PARK, AND MELVINDALE.

While some of the snow woods study found cancer cases in the area, it is not clear if the study was a reliable one.

PROPERTY VALUES

Ford Motor Company's report states that the property values on the site are currently worth \$31,000. per acre as of January 5, 1987. By the year 1996 it is estimated that the property will be worth a mere \$2,500 per acre. What concerns the residents of Downriver is what will happen to the value of residential homes, as well as the Cities tax base?

MANAGEMENT

It is stated in the permit application that Ford Motor Company will delegate the management of its facility to WAYNE DISPOSAL. Given the problems that have surfaced with their Romulus facility in the past several weeks, THIS IS OF GREAT CONCERN. DIOXIN was found by accident by the DNR, it was dumped there in violation of their permit. How can the residents of Downriver be sure that such a violation will not occur at the Oakwood facility, when the same firm will be managing it?

PUBLIC PARTICIPATION

J. of Law
U.S.
notes
More should have been done to publish the public hearing. I was contacted as late as Tuesday the 23rd., by members of the City of Dearborn paper who did not know a thing about the permit public hearing. In addition, neighboring Cities do not even know about the hearing.

The Department (DNR) only furnished one copy of the permit, and this was given to the City of Allen Park. When Melvindale contacted the Department it was told that it could purchase a copy for \$75.00. Our residents live closer to the site and are exposed to more potential problems than the majority of Allen Park residents. Thus, the City of Melvindale would like to go down on record as stating the public participation period should be extended and that all current information should be made available to the City of Melvindale at the expense of the applicant. This information is necessary

in order to allow the City an opportunity to give this permit application, the attention it deserves.

WATER MONITORING

The DNR and EPA have decided that monitoring of ground water at the site is not necessary. The City of Melvindale would like both the DNR and EPA to reconsider their position. In the event that a problem arises, the City will hold both agencies and their agents personally liable. The old addage should be cited, "IT IS BETTER TO BE SAFE THAN SORRY".

COMPLIANCE HISTORY

September 1982

1. Inspection log did not contain the time at which the inspections were conducted.
2. Inadequate personnel training.
3. Groundwater monitoring data not submitted to EPA.

April 12, 1983

1. An individual had not received the required training.
2. Inspections not accurately recorded.
3. April receipt log missing.
4. Run-on not properly managed.
5. Groundwater monitoring IAW specific conditions 16A, C, E & H was not met.
6. Surface water and sediment monitoring was not accomplished as required in specific conditions 17B, C & D.
7. Air monitoring as required in specific condition 19 was not accomplished.

June 14, 1983

1. Proper run-on and run-off management was not performed.

June 22, 1983

1. The leachate collection system was not installed as required in specific condition item 10A.
2. The vacuum road sweeper was not being used as required in specific condition item 12B.
3. Groundwater and leachate monitoring had not been performed and reported as required in specific conditions item 16 and 18 respectively.

September 23, 1983

1. Daily cover not applied as required.
2. Inspection report not accurately completed.
3. Notification plan submittal and approval for sewer construction was not properly coordinated through the MDNR as required.

January 31, 1984

1. MDNR staff issued a return to compliance letter regarding most deficiencies identified in the November 17, 1983 inspection.

April 11, 1984

1. Letter of warning was issued by MDNR staff. The letter related to an April 3, 1984 site visit and an observation by MDNR staff of the company improperly handling leachate at the facility.

April 12, 1984

1. Letter of warning was issued by MDNR staff relating to a Technical Service Section, HWD review and non compliance with specific conditions 5.A.4(a), 5.A.4(b) and 5.A.4(c).

June 21, 1984

1. Lack of required warning signs.
2. Insufficient daily cover.
3. Inadequate grading to prevent ponding.

September 27, 1984

1. Citizen complaint to Wayne County Air Pollution regarding dust problems.

March 18, 1985

1. Leachate plan revisions requested.
2. Wheel wash plans requested.
3. Monitoring as required in Section 17 and 18 requested.
4. Verification/certification info to be incorporated in operating log.
5. Maintenance of 6 inch head limit for leachate.

April 23, 1985

1. USEPA sent FMC notice of the Corrective Action Requirements and FMC's need to evaluate prior releases of hazardous waste.

September 9, 1985

1. Leachate level in excess of six inches.
2. Run-on not being prevented.
3. Proper decontamination needed on equipment.

December 18, 1985

1. Fence repair needed.
2. Missing warning signs.
3. Inadequate run-on control.

March 27, 1986

1. Warning sign missing.
2. Copy of ciennial report request.
3. Annual training update not performed for an individual.
4. Leachate level was too high.

September 16, 1986

1. Missing warning sign.
2. Contingency plan not reviewed annually.
3. Not keeping monitoring data current in the operating log.

December 8, 1986

1. Act 64 inspection conducted by MDNR staff relating to the December 8, 1986 inspection. The issue identified was that the inspection reports were not completed in their entirety.

April 1, 1987

1. Annual training update for an employee needed.
2. Soil sample results requested.

June 30, 1987

1. Excess leachate level.
2. Leak detection system for the underground tank was not operational.
3. Liquids found in secondary containment system.
4. Inspection report needs to document secondary containment inspections.

With a record of compliance violations like the above enumerated, any permit application should be given the strictest scrutiny. It is the City's recommendation that this permit NOT BE GRANTED until further study has been done. If and when the permit is granted the City would like all results of any test be sent directly to the City when the test results are sent to any agency.

We would also like to request a copy of the permit application.

It has been stated that this is a renewal ~~it~~ in fact is new app. with much larger perimeters.

Mr. Lee M. Thomas / Adm.
Environmental Prot. Agency

Dec. 1, 1988

Dear Sir:

We are writing this letter in the hope that you can do some good toward preventing Ford Motor Co. from disposing of toxic waste at the Allen Park clay mine. We live at 3444 Raymond, only a few blocks from this site and we are fearful of the many health hazards this dump can cause. We know of a large number of adults who have died of cancer in this area at a young age or are still suffering from it. We also fear that many other diseases could be caused by this

(2)

disposal of so many questionable materials. We have lived at this address for 39 years and raised our family here.

We hope to have a healthy future for us and our neighbors.

Please help in whatever way you can to put a stop to this! Thank you

Virginia A. Carroll
Gerald Carroll

3444 Raymond
Dearborn Mich
48124

File # MID 980-568-711

File # MID 980-568-711

2 DEC 88

Dear Sir:

I am "against" allowing toxic waste
to be disposed of at the Allen Park clay mine.

Please do everything you can to stop this
from happening.

Yours Truly,

Edward M. Rusinowak
2621 Edgewood
Dearborn Mich
48124

Gary M. Mousigian
2028 Venice
Dearborn, MI 48124
(313) 271-6868

Mr. Lee M. Thomas / Administrator
Environmental Protection Agency
401 M/S.W.
Washington, D.C. 20460

December 1, 1988

Dear Mr. Thomas:

I have sent this letter to you to express my displeasure at the Department of Natural Resources (DNR) for the approval of granting Ford Motor Company to dump toxic waste in Allen Park along Oakwood Boulevard and Southfield Expressway (The EPA file number is MID 980-568-711).

The proposed toxic dump site is located in an area where many people reside. Toxic waste material threatens areas in Allen Park. Neighboring cities such as southwest Detroit, Dearborn, Dearborn Heights, and Melvindale would also be exposed to toxic material that escapes from the dump.

On Thursday, September 15, the DNR held a meeting allowing residents to voice their complaints about the proposed toxic dump site. Several hundreds of people attended to voice their opinions and concerns. But the panel representing the DNR that night did not seem to be very receptive toward the local residents. Also, none of the panel members live in the area of the dump site which contributed to their seemingly "care free" attitude.

The DNR stated that there would be an enclosure to hold the toxic material. However, hazardous material would still pollute the air as well as the drinking water. Toxic waste can escape into the atmosphere while dumping as a result of wind gusts. Much waste material currently escapes trucks now onto the roads outside the dump. I am sure that this would continue to happen if they dumped toxic waste materials no matter how "careful" they are.

The enclosure is not "leak proof". Water main breaks under the clay foundation could damage the foundation resulting in contamination of our water supply affecting thousands of people. Moisture, the settling of the ground, tornadoes, and even earthquakes are potential dangers causing damage to the enclosure. As you might recall, two minor earthquakes occurred within the past ten years where the epicenter was located nearby in southern Ohio.

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Many cases of cancer were reported within a mile of the dump site when toxic wastes were dumped there only a few years ago. This toxic waste dump with its foundation would be like a time bomb ready to explode.

On two consecutive Thursdays, November 3 and November 10, many people opposing toxic waste organized a public demonstration in front of Ford Motor Headquarters. Many drivers passing by honked their horns in support of our cause. Groups such as the Snow Woods Society, Greenpeace, residents of Melvindale, and others have given us their support. The longer the Department of Natural Resources waits to make a decision allowing Ford to dump toxic wastes, the better our chances are for disapproval of toxic dumping. Please unite with us and do everything in your power to prevent toxic waste dumping. Call me at (313) 271-6868 if you have suggestions or comments.

Sincerely,

Gary M. Mousigian

P.S. One question to ask yourself: Would I want to live next to a toxic waste dump??? The answer is obviously, NO!

December 2, 1988

Dear Mr. Thomas,

We are residents of the Snow Woods,
Dearborn area. This letter is to express
our deep concern and displeasure at
allowing the D.N.R. to grant a permit
to Ford Motor Co. to dump toxic
waste near our home. (EPA File #)
MID 980-568-711. We bought our home
here 4 years ago because we wanted
our children to grow up in a safe, clean
environment. Under no circumstances
should a toxic or hazardous waste
landfill be allowed near a residential
area. This issue will require
immediate action and must be stopped.
Your help in this serious issue would
be greatly appreciated.

Sincerely Yours,
Ronald & Diane McKay
1916 Houston
Dearborn, Mi. 48124

(Over)

We feel that this matter is an
infringement upon our rights guaranteed
by the constitution of the U.S. of life,
liberty and the pursuit of happiness!

88DEC 7 A9:48

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11-30-88

Mr. Thomas,

Ref M I D 980-568-711

I believe this toxic waste dump
site should not be approved for
use, its too close to our homes.

Thank you

A. H. Olm

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88DEC 5 P 1:04

Mr. Thomas Noonan
1785 Venice
Dearborn, MI 48124
November 30, 1988

Mr. Lee M. Thomas
Administrator Environmental Protection Agency
401 M/S.W.
Washington, D.C. 20460
Reference: Toxic Waste Permit
File #MID 980-568-711

Dear Mr. Thomas:

This letter is being sent to you by a very concerned Citizen of Dearborn, Michigan. Having lived in the near vicinity (approximately 5 blocks away) of the Ford Motor Company Toxic Waste Dump for over 37 years I am amazed to hear that a permit to continue use of the site for Toxic Waste is even under consideration.

Until recently I was unaware that Toxic Wastes were dumped at the site. Now realizing this I wonder how many of my friends and neighbors who have died of cancer in our immediate neighborhood in the past couple years may have been affected by this dump.

Please, in the name of humanity do not continue to allow Toxic Wastes to be dumped in our immediate area any more. Deny Ford Motor This Permit.

Very truly yours,

A handwritten signature in dark ink, appearing to read "T.R. Noonan", with a long horizontal flourish extending to the right.

T.R. Noonan

TRN /bw

88DEC 5 P 3: 06

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CORR. CONTROL

EPA

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Mr. Thomas,

I am sending you a copy of a letter I wrote to Mr. Jim Mitzelfeld of the Detroit News. It deals with some issues I raise in regards to the TOXIC landfill in Allen Park which effects many communities.

After seeing my concerns, I hope you can appreciate how an average citizen effected by this situation feels (i.e. SCARED). I am hoping that you come to the same conclusions and then use the power of your position to influence that the new permit isn't granted and the previous toxic waste dumped in the landfill be excavated and neutralized and/or safely disposed of.

Please Help Us,

Mrs. Debbie Dryjer Kinirsa

NOV. 19, 1988

3371 RAYMOND

DEARBORN, MICH 48124-4343

MR. JIM MITZELFELD
The DETROIT NEWS
615 WEST LAFAYETTE
DETROIT, MICH 48231

Dear Mr. Jim Mitzelfeld

I am so pleased to see the articles you have done on the TOXIC landfill in Allen Park... Nov. 18 & 19th. Especially the Friday edition which was on the front page! Our problem needs exposure in order for people to take action.

There are a few issues I want to point out to you though.

① Why is the DNR under pressure to grant the permit from the EPA? The ENVIRONMENTAL Protection Agency is suppose to "PROTECT" us. You would think they would want to research this problem better.

② ANN SCHWARTZ, chief of the Mich. CANCER FOUNDATION'S Epidemiology unit does NOT intend to interview residents BUT merely to go by an existing TRI-county registry which goes from 1973-1986. That's not good enough?

How does one get on her registry?

I have cancer cells in my uterus. I am 32 and only married 3 yrs. Am I on her registry? Does my doctor give out such information -- I will check into this! On my block there are so many people who

died or are dying^{now} of cancer). Are they on her list? I think not especially like Mr. Ed Olofson who is dying of unoperable lung cancer who lived across the street from me. He lived there for years and just moved about a year ago to another neighborhood. Words Jerome Amber would be quick to say it was because of his lifestyle or other environmental factors. Ann Schwartz would say it was his age. BULLshit! He was a retired gym TEACHER in great shape for his age and he NEVER smoked cigarettes a day in his life. In fact he was married to a nurse. You know what's ironic, his RETIREMENT home is even closer to the dump... maybe ~~God~~^{Ford's} will put him out of his misery and let him die faster because he moved closer!

He is not the only horror story. There are more than average #'s of these stories here... you just aren't talking to the right people. You are talking to people who have some sort of vested interest in concealing our sicknesses.

Plus people seem to be overly childless here. Many, many couples have adopted children. I ask why? TOXINS?

- ③ You say the DNR's Quackenbush says the new permit will probably be issued in the next few weeks. And the MICH. CANCER FOUNDATIONS Ann Schwartz said, "If we do find something they CAN ALWAYS take the LICENSE AWAY." Hogwash Everyone (lawyers, experts, citizen groups, politicians) I hear speak says that once the permit is granted there is nothing we can do. You can not overturn it. All we can do is stop the permit from being granted --- that is our only hope!
- ④ The permit isn't even granted yet and Ford's has ALREADY begun construction on the new area. My husband is there ^{THE DUMPS} mailman and for about a month now he sees them doing all kinds of construction & digging going on there. I have also heard others report the same thing (EX MRS. EILEEN NIEVES 3362 RAYMOND DBN. MI 48124)
- ⑤ Ford's claims that they haven't dumped TOXIC WASTE there since 1986 yet every community meeting I attend on this topic people report seeing men in protective clothing dumping stuff in there after 11pm.
- (#1) If it's not toxic why are they wearing special clothing?
- (#2) If it is authorized why are they dumping after 11pm?

(#3) If they haven't been dumping toxins at 17005 Oakwood since 1986, where are they dumping them?

⑥ JERRY AMBER, Ford's chief staff engineer for industrial wastes said that he didn't find it odd as to the numbers of cancers in my area (SNOW WOODS^{DEARBORN'S}) because "cancer is so common among older people". BIRDSEED!!!

I am 32 and have had cancer cells in my uterus for a couple of years and worry if this will effect me having children.

Also Betty Bennett* whom you mentioned in your ~~last~~ Nov 19th article wrote to our Congressmen, Representatives, EPA, DNR mentioning a couple of ^{YOUNG} women she knows of in her neighborhood with the same condition.

Also my one neighbor, Eileen Nieves*, recently told me her daughter (32 yrs old) has the same problem. No health study has been around here -- otherwise the truth would come out. I wouldn't doubt the little children are sick too. I just don't know enough neighbors with kids.

*Both of these women have lists of CANCER & CANCER deaths in their specific neighborhoods in DEARBORN.

We wouldn't mind a toxic landfill in our highly populated neighborhood if every effort

1727 Linden

3362 Raymond

was made to (#1) neutralize the TOXINS FIRST and then (#2) dispose of these toxins in proper containers that can't ~~seep~~ seep and then store these containers in a building that's totally enclosed so it can't seep into our ground water OR ooze into our air supply! We are drinking and breathing this stuff. It's going through our skin pores.

In Saturdays Detroit News you say that Jerry Amber said "Ford has tried to work with residents, answer their concerns & promised to meet the strictest safety guidelines." Bullshit! I been to the public hearings and landfill meetings and never did this man or another representative of Ford's stand up and answer our concerns! No but Ford representatives AND LAWYERS were there listening to every thing we had to say ... what, to stay one step ahead of us in our pursuits? They were there laughing & joking before the September 15th, 1988 public hearing with Peter Quackenbush of the Michigan DNR.

Are people in high places getting paid off to allow such dumping? It sure appears that that is the only answer.

Ford Motor Company has money. Politicians need money to run campaigns. The DEPARTMENT

of NATURAL RESOURCES and the ENVIRONMENTAL Protection Agency two agencies formed to protect us let such dangerous practices go on all around us. FOR EXAMPLE, why does Ford Motor Company get to police their own toxic waste facility? Of course they are going to say that they meet the standards. If some poor Ford Motor Co. employee blew the whistle, he would loose his job. Why aren't the people of the effected cities (Dcn., Dcn. Hts., Allen Park, Melvindale, SW. Detroit), their community organizations AGAINST the dump (EX SNOW Woods Group) and the Mayors and Independent INDUSTRIAL WASTE EXPERTS along with the EPA & DNR monitoring (testing) the site on a regular basis?

This is a blatant disregard for public concerns. Maybe you, Mr. Mitzelfeld, can hit the right nerve with your articles. My husband, my neighbors and myself are amazed that no one in power that we have contacted has made any effort to do anything. This problem will not simply go away, we can't just shut our eyes. Now that you see some of our concerns, maybe you can delve into them in future articles. God Bless You for bringing our concerns

to print. And thank-you for front page news.

Sincerely,

Debbie Dryjer Kimuria

P.S. If you need any information of this landfill
BRENDA LIVE OAKS is the woman to contact. She
has researched this matter thoroughly and knows
all about toxic waste. She is the person I
would put on TV if I could choose a community rep.

S.W. Detroit

Copies To...

DBN HEALTH DEPT
MICH CANCER SOCIETY
GOV. J. BLANCHARD
SEN. GEO. HART
SEN. DON RIEGLE JR. (ENVIRONMENT COMMITTEE)
SEN. CARL LEVIN
CONG. WILLIAM RUNCO
~~SEN. JOHN DINGELL~~, (U.S. CONGRESSMAN)
PETER QUACKENBUSH (MICH DNR)
DAVID PETROVSKI (U.S. EPA)
KEN BURDA (DNR LANSING)
MAYOR M. GUIDO (DBN)
MAYOR T. COOGAN (MELVINDALE)
TOM DUFFY - SNOW WOODS PRES.
KEN ZIMNICKI - SNOW WOODS DIRECTOR
BETTY & EDWARD BENNETH - CONCERNED CITIZENS DEARBORN
BRENDA LIVE OAKS - CONCERNED CITIZEN DETROIT
DR. TOM SHOENS - DIRECTOR OF TESTING OF AIR TOXINS
WAYNE COUNTY AIR POLLUTION
BILL BONDS - CHANNEL 7 WAYZ TV ANCHOR PERSON
ANN BASSIO - CONCERNED CITIZEN DEARBORN
CURTIS MCGUIRE - CONCERNED CITIZEN ALLEN PARK
VICTOR & VIOLET FLOWERS - CONCERNED CITIZEN ALLEN PARK
ANN SCHWARTZ - MICHIGAN CANCER FOUNDATION - CHIEF OF EPIDEMIOLOGY UNIT
LEE M. THOMAS (EPA - WASHINGTON DC)

11-30-88

Dear Mr Thomas

In regards to file # MID 980-568-711
I feel the permitt should be denied. The
site is to close to heavily populated residential
areas and its to much of a gamble with
our health.

Put it in your back yard not mine!

Thank you

David Madge
1913 Hollywood
Dearborn Mi. 48124

88DEC 2 P 3: 38

18,570

EPA
CORR. CONTROL

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